

<b>TRAD GROUP POLICY</b>
<h1 style="margin: 0;">MENTAL HEALTH WELLBEING POLICY</h1>

REV	DATE	STATUS / DESCRIPTION OF CHANGES
07	16-Oct-20	General revision and change of logo and company titles, including details of the TRAD Group <sup>1</sup>
06	07-Apr-20	General revision, inclusion of risk assessment and HSE stress guidance, and new directors cited.
05	04-Jun-19	General revision and change of directorship
04	19-Nov-18	Transfer of company procedures into Group Policy
03	12-Nov-18	General revision of procedure
02	20-Nov-17	General revision of procedure
01	02-May-15	General revision of procedure
00	30-Apr-14	First issue of procedure

<b>DOCUMENT NO.</b>	<b>TRAD-POL- 007</b>
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<sup>1</sup> Please note that the TRAD Group consists of TRAD Scaffolding Contractors and TRAD UK. TRAD Scaffolding Contractors is a brand name for TRAD Scaffolding Co Limited; TRAD UK is a brand name for Trad Hire & Sales Ltd.

STATEMENT

TRAD Group CEO Des Moore and company heads are committed to the promotion of wellbeing including good mental health, striving to remove the stigma and supporting and mentoring those that have issues.

**Note:** this TRAD Group Policy (underpinned by ALTRAD group policies, including the ALTRAD Code of Conduct, also available on our website) is applicable to every company within the TRAD Group – comprising of **TRAD Scaffolding Contractors** and **TRAD UK** – and all TRAD companies will ensure full compliance.<sup>2</sup> The word “company” will be used throughout as every one of the TRAD companies has slightly different procedures and processes, which nonetheless adhere to policy.

Des Moore President (2017-19) of our trade body the National Access & Scaffolding Confederation (NASC) at his inaugural address discussed mental health on a personal and corporate level. He explained to the AGM that he had suffered from mental health issues in the past and today openly discusses his breakdown with others to destigmatize mental health issues. Since the 1990s, As Director, Managing Director and now Group CEO, he has put in a number of measures including our bespoke **Knowledge Inspired Mentoring** scheme to prevent mental health issues at the TRAD Group.

Des Moore concluded his speech at the NASC AGM in November 2017 by encouraging all companies to put in place measures to promote good mental health, including signing up to the Time to Change Employers Pledge: <https://www.time-to-change.org.uk/get-involved/get-your-workplace-involved/employer-pledge> and driving the NASC’s **Head for Heights**’ mental health wellbeing initiative, which has led to the creation of NASC **SG38 Mental Health Wellbeing Guidance**, and which is free to download on the NASC website: <https://nasc.org.uk/>

TRAD will also ensure that the mental health wellbeing risk to our people during potentially difficult circumstances (such as during the COVID-19 virus pandemic) are minimised to as low as practical and full controls are put into place where required (such as for instance, creating RA addendums and instigating increased contact and information sharing and updates).

If you require any more information, or a copy of TRAD’s Business Continuity Plan, please speak to the relevant TRAD Line Manager or email [enquiries@trad.co.uk](mailto:enquiries@trad.co.uk) or ring 020 8980 1155.

TRAD Group CEO has taken a proactive stance on wellbeing and to remove the stigma of mental health in one of the most macho industries within the construction business (but it is worth noting that this mental health wellbeing stance has been invested within TRAD since the early 1990s).

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In the ***Tackling Work-Related Stress Using the Management Standards Approach*** book, the HSE defines stress as ‘the adverse reaction people have to excessive pressure or other types of demand placed on them’. This makes an important distinction between pressure, which can be positive if managed correctly, and stress, which is likely to be detrimental to physical or mental health if it is prolonged.



TRAD are committed to the following principles to improve wellbeing and reduce stress:<sup>3</sup>

1. Produce, implement and communicate a mental health at work plan.
2. Develop mental health awareness among employees.
3. Encourage open conversations about mental health and the support available when employees are struggling.
4. Provide our employees with good working conditions.
5. Promote effective people management.
6. Routinely monitor employee mental health and wellbeing.

As part of that process, TRAD will:

- Carry out a risk assessment (detailed in this policy) to identify all workplace stressors and eliminate or control the risks from stress and this will be regularly reviewed);
- Instruct managers at a local level to risk assess stress and other mental health wellbeing issues, identify all workplace stressors, and eliminate or control the risk of stress on a continual basis;
- Consult with employees on suggested action relating to the prevention of workplace stress (hence implementation of the EAP, which came out of safety seminars in 2019 and 2020);
- Brief managers and supervisors in good management practices (with many managers undertaking mental health first aid training);
- Via our EAP programmed, provide confidential counselling for staff affected by stress caused by either work or external factors;
- Provide adequate resources to enable managers to implement the company’s agreed stress management strategy and policy.

<sup>3</sup> TRAD have taken these directly from: *Thriving at Work*

[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)

## TRAD AND *THRIVING AT WORK*

### 1. Produce, implement and communicate a mental health at work plan.

TRAD have created this policy (and mental health at work plan) as a live document to improve mental health wellbeing within the TRAD Group. TRAD have appointed a number of mental health champions, Wellbeing listeners, and mental health first aiders to assist in implementing and communicating the mental health plan.

Following on from the successful Safety Seminars recently arranged in 2019 and 2020, TRAD arranged an Employee Assistance Programme (EAP) for all our employees and our dedicated mental health first aiders.

TRAD have also promoted the EAP, including by text and memo:

The EAP Programme is an additional service provided by TRAD to offer you support and assistance when required, ranging from legal information, dealing with stress, debt, anxiety plus many other services.

**Note:** this service can only be accessed by TRAD employees and ceases once you leave our employment.

Please find enclosed a leaflet giving more information on the services provided by Health Assured and how to access them, including a card you can keep in your purse/wallet.

Health Assured is a third-party provider and deal with any support or assistance that you require in the strictest of confidence and do not share your information with any other third party without your prior consent.

Please take the time to download the APP: **Health e-Hub**, as the Online Health Portal provides a wealth of health information and advice or visit their website: **healthassuredeap.com**



TRAD will continually look at initiatives which will help promote wellbeing and reduce the risk of stress (which is not always work related – but can be part of home issues such as divorce or bereavement).

One is exercise – and TRAD will consider payments/encourages to fund gym membership or pay for cycles (and if necessary cycling safety training), to encourage wellbeing for our people).

This includes senior management teams who are potentially more at risk in relation to stress and should also be briefed to understand the risks of stress and some of the things they can do to alleviate stress (including exercise etc).

This also includes recently promoted staff who have come through the ranks (colloquially those who have come “off the tools”) and how we mentor and encourage them to succeed, with minimum of stress. Ideas include, getting these staff – and existing staff – to talk about mental health, which hopefully brings the causes to be more visible and help with the stigma surrounding the issue.

## **2. Develop mental health awareness among employees.**

Group Company Heads, Group HR Director, Depot Managers and Line Managers have been tasked with championing and implementing the group’s commitment to improving mental health, by implementing the EAP, by challenging the stigma, and by talking to employees to raise awareness.

TRAD have always assessed the mental health needs of its employees but this enables us to formally document the procedures, develop structured improvements and in future assign clear objectives as part of a business plan, where required, aspects of which it can share with other companies and our trade body.

TRAD will continue to review all the group company’s policies, procedures and processes to ensure they are aligned with the group’s commitment to improve mental health and wellbeing.

Select TRAD employees have been, and will be trained in future, on mental health and we will continually ask everyone to keep talking and to check on others and look for signs that they may need mental health support – and how to access information on the group/company’s approach to mental health and wellbeing – and where to seek advice (including via the EAP).

Mental health first aiders after training are much more able to handle sensitive conversations and give good advice and support to employees (as well as offering support via government initiatives (such as Fit for Work and Access to Work and TRAD’s EAP).

## **3. Encourage open conversations about mental health and the support available when employees are struggling.**

Communication is very important and the group’s unique business model ensures that information is widely available and employees are expected to discuss problems with their own teams and to seek help with managers, directors and company heads (with an open door policy promoted and teams driving effective wellbeing – and managers at induction, appraisals and regular meetings informing employees of where to seek advice and support (through their line manager, director or company head as well as through the Group HR Director).

Please note that TRAD openly discuss concerns, potential mental health issues in meetings (including one to one meetings) as this is a key business issue, as TRAD depend enormously on their employees, which we consider are in the top 10% of the construction industry.

#### **4. Provide our employees with good working conditions.**

TRAD policies, procedures and processes provide our employees and workers with good working conditions, but TRAD are not complacent and employees and workers are encouraged to voice any concerns in relation to working conditions, stress or mental health issues as well as positive issues.

TRAD's staff and Mental Health First Aiders are tasked with engaging with employees and workers to discuss any issues employees/workers may have, including regarding work issues, developments which have impinged on their ability to do their job. TRAD's Line Managers and First Aider will discuss issues in informal meetings with employees and where needed will assist them. This sometimes may be the result of where the company restructures, or grows or diminishes in size, and employees will be kept fully informed and supported.

#### **5. Promote effective people management.**

TRAD has a unique flat management structure, with its separation into small separate divisions with good gender balance, which is designed to ensure that even as a company grows that the employees are fully informed, supported and mentored. Short meetings are held regularly with staff to ensure they are fully informed of work of company aspirations, initiatives, work requirements, and that work is challenging and rewarding. Staff at all levels are encouraged to speak to their immediate line manager or director or company head regarding potential issues such as stress as early as possible, with an emphasis on ensuring that the workplace promotes harmony and healthy behaviours.

#### **6. Routinely monitor employee mental health and wellbeing.**

As part of this initiative, TRAD will continue to talk to employees on mental health and wellbeing, including working conditions, communication, work life balance, and available or perceived support and work related concerns (such as work load, stress).

As part of this drive, TRAD will focus on hourly paid workers (as this is often manifested in absenteeism at work and at yards) and TRAD's HfEQ Personnel will routinely check on employee's health and wellbeing during audits.

Where there are risks to employees' mental health through stress for instance, the Group HR Director will arrange meetings with Line Manager(s) and ensure that control measures are put in place (such as putting them in touch with further support via the EAP or by changing work patterns after consultation. Job designs and the workload of the team (including job descriptions) is

reviewed holistically as part of a group/company approach to ensure work is challenging but also interesting (but will also continue to use the HSE's guide to stress and advice from Wedlake Bell).

**Note:** Group HR Director Ros Howe as befitting her role has an open door policy and all conversations regarding mental health remain confidential. Group HR Director will also arrange confidential external support and advice where required. Where employees take time off due to mental health issues, they are fully supported on their return to work, with adjustments made where necessary.

Where required, the group makes changes to employees' work duties (such as flexible working) to ensure they can continue to work for the group productively.

Employees are encouraged to be competitive as part of small teams (many of whom have come from the "tools" and were considered the best foremen for instance in the company), with managers and directors arranging for all teams to meet up regularly to ensure that the competition is healthy, friendly and enjoyable. Directors ensure they act professionally and communicate through all levels. They and managers are encouraged to show appreciation for good work and to make everyone on the group/company feel supported and valued.

As part of that approach, Directors arrange social events and also encourage employees to take exercise, become involved in volunteering and the group/company often pay for junior football strips for youth teams for instance.

TRAD's bywords when dealing with staff, employees and clients are: professionalism, patience, civility and care.

**Mental Health Wellbeing and Stress Risk Assessment**

TASK RISK ASSESSMENTS										
Hazard	Hazardous event	At risk	Initial Risk			Risk Control Measures	Residual risk			
			L	S	R		L	S	R	RR
Work operations	Stress from work caused by lack of top level commitment and/or planning	Employee, their family, others (such as team mates)	3	4	12	<ul style="list-style-type: none"> <li>As per TRAD's Policy, other sections of the RA, and the following:</li> <li>TRAD are committed to acting professionally, fairly and with integrity in all our business details and relationships wherever we operate and to implementing and enforcing effective systems to improve people's work operations;</li> <li>Compliance in this area is monitored by the Senior Board members and Line Managers;</li> <li>TRAD will ensure that a whistle blowing process in place (via the Group HR Director);</li> <li>TRAD will implement this policy (and mental health at work plan) as a live document to improve mental health wellbeing within the TRAD Group).</li> <li>TRAD will develop mental health awareness among employees, encourage open conversations about mental health and the support available when employees are struggling, provide our employees with good working conditions, promote effective people management and routinely monitor employee mental health and wellbeing.</li> <li>TRAD will also carry out a risk assessment (detailed in this policy) to identify all workplace stressors and eliminate or control the risks from stress and this will be regularly reviewed);</li> <li>Via our EAP programmed, provide confidential counselling for staff affected by stress caused by either work or external factors;</li> <li>Provide adequate resources to enable managers to implement the company's agreed stress management strategy and policy;</li> <li>TRAD's Play it Safe teams and HSEQ/HR teams will:</li> <li>Involve representation or represent the views of all elements of the workforce;</li> <li>Perform a pivotal role in ensuring that this policy is implemented;</li> <li>Oversee monitoring of policy and other measures to reduce stress and promote workplace health and safety.</li> <li>TRAD will ensure employees can:               <ul style="list-style-type: none"> <li>Raise issues of concern with their Line Manager/Supervisor or HR/HSEQ;</li> <li>take an active part in the process of assessing the risk, e.g. completing surveys or providing honest feedback when requested;</li> <li>Accept opportunities for counselling when recommended (via our Employment Assistance Programme, EAP).</li> </ul> </li> </ul>	1	4	4	Low
Work operations	Stress from work caused by lack of commitment and/or planning by Line Managers and Supervisors	As above	3	4	12	<ul style="list-style-type: none"> <li>As per TRAD's Policy, other sections of the RA, and the following:</li> <li>Company will drive mental health wellbeing awareness, with senior staff talking about their own issues and striving to destigmatise mental health issues;</li> <li>TRAD will instruct managers at a local level to risk assess stress and other mental health wellbeing issues, identify all workplace stressors, and eliminate or control the risk of stress on a continual basis;</li> <li>Consult with employees on suggested action relating to the prevention of workplace stress (hence implementation of the EAP, which came out of safety seminars in 2019 and 2020);</li> <li>Brief managers and supervisors in good management practices (with many managers undertaking mental health first aid training);</li> <li>Brief everyone on the need to ensure good communication between management and staff, particularly where there are organisational and procedural changes;</li> <li>TRAD to ensure staff are fully trained/briefed/informed to discharge their duties;</li> <li>TRAD to ensure staff are provided with meaningful developmental opportunities;</li> <li>TRAD to monitor workloads to ensure that people are not overloaded or underutilised;</li> <li>TRAD to discourage work-related contact with staff outside normal working hours or whilst on holiday;</li> <li>TRAD to monitor working hours and overtime to ensure that staff are not overworking; monitor holidays to ensure that staff are taking their full entitlement;</li> <li>TRAD to attend training, as requested, in good management practice and health and safety;</li> <li>TRAD to ensure that bullying and harassment is not tolerated within their jurisdiction.</li> </ul>	2	4	8	Med



## TRAD Group Policy – Mental Health Wellbeing

TASK RISK ASSESSMENTS										
Hazard	Hazardous event	At risk	Initial Risk			Risk Control Measures	Residual risk			
			L	S	R		L	S	R	RR
Work operations	Stress from work caused by lack of advice / assistance.	As above	3	4	15	<ul style="list-style-type: none"> <li>• As per TRAD's Policy, other sections of the RA, and the following:</li> <li>• TRAD have appointed a number of mental health champions (wellbeing listeners), and mental health first aiders to assist in implementing and communicating the mental health plan;</li> <li>• TRAD have arranged an Employee Assistance Programme (EAP) for all our employees and our dedicated mental health first aiders.</li> <li>• TRAD's HSEQ team will also:</li> <li>• Provide specialist advice and awareness training/briefing/awareness on stress;               <ul style="list-style-type: none"> <li>○ Train/brief/mentor and support managers in implementing stress risk assessments;</li> <li>○ Support individuals who have been off sick with stress and advise them and their management on a planned return to work;</li> <li>○ Refer to EAP as required;</li> <li>○ Monitor and review the effectiveness of measures to reduce stress;</li> <li>○ Inform the employer and the Safety Leadership Team of any changes and developments in the field of stress at work.</li> </ul> </li> <li>• TRAD's HR will also:               <ul style="list-style-type: none"> <li>○ Give guidance to managers on the stress policy;</li> <li>○ Help monitor the effectiveness of measures to address stress by collating sickness absence statistics;</li> <li>○ Advise managers and individuals on training requirements;</li> <li>○ Provide continuing support to managers and individuals in a changing environment and encourage referral to EAP where appropriate.</li> </ul> </li> </ul>	1	4	4	Low
Work operations	Stress from work caused by large scale changes, redundancies, furloughing (e.g. due to COVID-19 virus), movement of depots etc	As above	3	4	15	<ul style="list-style-type: none"> <li>• As per TRAD's Policy, other sections of the RA, and the following:</li> <li>• TRAD's senior management team will ensure that any planning for eventualities is done correctly and in line with legislation and best practice;</li> <li>• They will ensure all communication is clear and explicit, giving employees the opportunity to voice concerns.</li> <li>• TRAD's HR will also:               <ul style="list-style-type: none"> <li>○ Ensure that TRAD's Staff Handbook is made available to all employees;</li> <li>○ Ensure that consultation is done per handbook;</li> <li>○ Ensure that all correspondence/information is done tactfully, and with due regard to other people's feelings;</li> <li>○ Give guidance to managers and others on the stress policy;</li> <li>○ Refer to EAP where required.</li> </ul> </li> <li>• Line Managers/Supervisors to maintain contact with employees.</li> </ul>	1	4	4	Low
Home life changes/issues	Stress from home life (caused for instance by bereavement, illness, including COVID-19 virus illness)	As above	3	4	15	<ul style="list-style-type: none"> <li>• As per TRAD's Policy, other sections of the RA, and the following:</li> <li>• TRAD striving to make the discussion of mental health wellbeing more possible, with open dialogue with senior people routinely requesting all employees to check on other's wellbeing (to encourage them when there is a problem to ask for help);</li> <li>• TRAD have appointed a number of mental health champions (wellbeing listeners), and mental health first aiders to assist in implementing and communicating the mental health plan;</li> <li>• TRAD have arranged an Employee Assistance Programme (EAP) for all our employees and our dedicated mental health first aiders;</li> <li>• Line Managers/Supervisors instructed to be vigilant and offer additional support to a member of staff experiencing stress outside work, e.g. bereavement or separation;</li> <li>• Line Managers/Supervisors to maintain contact with employees.</li> </ul>	2	4	8	Med
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## TRAD Group Policy – Mental Health Wellbeing

TASK RISK ASSESSMENTS							Residual risk																																							
Hazard	Hazardous event	At risk	Initial Risk			Risk Control Measures	L	S	R	RR																																				
			L	S	R																																									
LIKELIHOOD (L) = Frequent (5) - Probable (4) - Occasional (3) - Improbable (2) - Remote (1) SEVERITY (S) = Catastrophic (5) - Major (4) - Reportable (3) - Serious (2) - Minor (1)      DEGREE OF RISK (DR) = LIKELIHOOD x SEVERITY  <b>Note for RAMS writer:</b> if residual risk (AFTER control measures have been written) is higher than 12 then TRAD must reassess work processes and put in place further measures to reduce the risk.																																														
										<table border="1" style="margin: auto; border-collapse: collapse;"> <caption style="font-size: small;">Risk Assessment Matrix</caption> <tr> <td></td> <td style="width: 15px;">5</td> <td style="width: 15px;">4</td> <td style="width: 15px;">3</td> <td style="width: 15px;">2</td> <td style="width: 15px;">1</td> </tr> <tr> <td style="width: 15px;">5</td> <td style="background-color: red;">25</td> <td style="background-color: red;">20</td> <td style="background-color: red;">15</td> <td style="background-color: orange;">10</td> <td style="background-color: green;">5</td> </tr> <tr> <td style="width: 15px;">4</td> <td style="background-color: red;">20</td> <td style="background-color: red;">16</td> <td style="background-color: orange;">12</td> <td style="background-color: green;">8</td> <td style="background-color: green;">4</td> </tr> <tr> <td style="width: 15px;">3</td> <td style="background-color: red;">15</td> <td style="background-color: orange;">12</td> <td style="background-color: orange;">9</td> <td style="background-color: green;">6</td> <td style="background-color: green;">3</td> </tr> <tr> <td style="width: 15px;">2</td> <td style="background-color: orange;">10</td> <td style="background-color: orange;">8</td> <td style="background-color: green;">6</td> <td style="background-color: green;">4</td> <td style="background-color: green;">2</td> </tr> <tr> <td style="width: 15px;">1</td> <td style="background-color: green;">5</td> <td style="background-color: green;">4</td> <td style="background-color: green;">3</td> <td style="background-color: green;">2</td> <td style="background-color: green;">1</td> </tr> </table> <p style="font-size: x-small; margin-top: 5px;">Low 1-6    Medium 8-12    High 15-25</p>		5	4	3	2	1	5	25	20	15	10	5	4	20	16	12	8	4	3	15	12	9	6	3	2	10	8	6	4	2	1	5	4	3	2	1
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**Declaration**

The TRAD Group is fully committed to ensuring compliance both with the letter and spirit of the principles of this Policy. For that reason, Mr. Moore has been appointed with the responsibility and authority to oversee and drive compliance. The Group, the Group CEO, Managing Directors, Directors and Managers are committed to continual improvement and this Policy will be reviewed annually and the Policy will be disseminated throughout the Group and supply chain as required.

For and on behalf of the TRAD Group: <sup>4</sup>

**Des Moore,**  
**TRAD Group CEO**




**Dated:** as front page

**Peter McShane,**  
**TRAD Scaffolding Contractors**  
**Managing Director**



**Dated:** as front page

**Colin Dobson,**  
**TRAD UK,**  
**Managing Director**



**Dated:** as front page

**Jim Gorman,**  
**TRAD UK,**  
**Deputy Managing Director**



**Dated:** as front page

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