



Internal Audit

FINAL

Southway Housing Trust

Assurance Review of Staff Mental Health and Wellbeing

2023/24

January 2024

Executive Summary

OVERALL ASSESSMENT		KEY STRATEGIC FINDINGS											
		The Employee Wellbeing Policy is still in draft and is to be approved by the end of January 2024. Any employee who raises mental health as a reason for absence is automatically referred to occupational health for a health assessment which may include an early stress intervention consultation. Arrangements to help and support employees include an Employee Assistance Programme and Flexible working. Overall sickness rates are reported to and monitored by the Board of Trustees on a regular basis.											
ASSURANCE OVER KEY STRATEGIC RISK / OBJECTIVE		GOOD PRACTICE IDENTIFIED											
13/ Impact of Low staff morale on productivity.		Regular communication takes place with staff on long term absence and return to work plans and support are provided to assist their return. A Wellness Action Plan is in place. This helps the relevant Line Managers to support the mental health of their team in the most suitable way.											
SCOPE		ACTION POINTS											
The review appraised the approach to staff wellbeing including the initiatives in place to support staff suffering with mental health issues. This included the preventative measures in place, support provided to staff, any intervention strategies and monitoring of staff absence.		<table><tr><th>Urgent</th><th>Important</th><th>Routine</th><th>Operational</th></tr><tr><td>0</td><td>0</td><td>0</td><td>0</td></tr></table>				Urgent	Important	Routine	Operational	0	0	0	0
Urgent	Important	Routine	Operational										
0	0	0	0										

Assurance - Key Findings and Management Action Plan (MAP)

Rec.	Risk Area	Finding	Recommendation	Priority	Management Comments	Implementation Timetable (dd/mm/yy)	Responsible Officer (Job Title)
No recommendations were made.							

PRIORITY GRADINGS

1	URGENT	Fundamental control issue on which action should be taken immediately.
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2	IMPORTANT	Control issue on which action should be taken at the earliest opportunity.
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3	ROUTINE	Control issue on which action should be taken.
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Operational - Effectiveness Matter (OEM) Action Plan

Ref	Risk Area	Finding	Suggested Action	Management Comments
No Operational Effectiveness Matters were identified.				

ADVISORY NOTE

Operational Effectiveness Matters need to be considered as part of management review of procedures.

Findings



Directed Risk:

Failure to properly direct the service to ensure compliance with the requirements of the organisation.

Ref	Expected Key Risk Mitigation		Effectiveness of arrangements	Cross Reference to MAP	Cross Reference to OEM
GF	Governance Framework	There is a documented process instruction which accords with the relevant regulatory guidance, Financial Instructions and Scheme of Delegation.	In place	-	-
RM	Risk Mitigation	The documented process aligns with the mitigating arrangements set out in the corporate risk register.	In place	-	-
C	Compliance	Compliance with statutory, regulatory and policy requirements is demonstrated, with action taken in cases of identified non-compliance.	In place	-	-

Other Findings



An Employee Wellbeing Policy is in place. The Policy sets out the Trust's approach to the management of employee mental health and wellbeing, including the obligations placed upon the Trust to ensure that support is available for the maintenance of mental health. The Policy details the key responsibilities of Line Managers, employees and the Human Resources (HR) department in ensuring that risks are prevented and managed and to ensure that any issues or concerns surrounding health and wellbeing are appropriately raised. The Health and Safety at Work Act 1974 and the Management of Health and Safety at Work Regulations 1999 have been appropriately referenced in the Employee Wellbeing Policy.

The Employee Wellbeing Policy is supported by other policies such as Flexible Working Policy, Sickness Policy, Bullying and Harassment Policy, and Medical Redeployment Policy. It was, however, noted that the Employee Wellbeing Policy and the Medical Redeployment Policy are currently in draft form, being reviewed by the Chief Executive Officer and awaiting approval. Approval of these policies is scheduled for January 2024.



The Head of HR has overall responsibility in relation to the staff wellbeing arrangements across the Trust and to ensure that staff suffering from mental health issues are appropriately supported. The Head of HR is supported closely by two HR Advisors and 19 Mental Health First Aiders (MHFA).

Other Findings



The "Impact of Low staff morale on productivity" is an identified risk on the Trust's Strategic Risk Register. Appropriate mitigating controls are in place, which include: a wide range of staff benefits including subsidised healthcare, Health and Wellbeing Offer and staff recognition and rewards event. Further actions to help with mitigating the risk have been recorded and these include team discussions around issues and solutions to improve health and wellbeing and engagement with the Trust. The risk was confirmed to be last reviewed by the Audit and Risk Committee during their meeting in October 2023.



Discussions with the Head of HR confirmed that internal weekly reports are produced by the HR Advisors for the different service functions that they oversee. These weekly reports are then shared and discussed with the Head of HR who reviews and monitors staff absence, significant sickness cases and support, advice, and guidance available. The reports are supported by monthly reports shared with Managers, quarterly reports shared with Managers and the Executive Team and annual reports to the Board of Trustees. It was confirmed that the HR Advisors hold weekly meetings with Line Managers to provide support and guidance and review data in areas where there are significant absence cases.



On applying to become an employee of the Trust, applicants are asked to confirm whether they are suffering from any disability or will require adjustments if successful in their application. At the offer stage, new employees are provided with an occupational health questionnaire that requires them to confirm whether there are any adjustments to be made prior to employment commencing. Where an employee confirms that adjustment(s) are required, they are interviewed to discuss options available and to effectively put a plan in place for them to stay in work. This includes referral to the Trust's occupational health provider. Examples of adjustments made could include frequent breaks, flexible working and regular visits to hospital for staff suffering with mental illness during office hours.



An Employee Assistance Programme (EAP) is in place. This service is provided by Health Shield and as part of its services to employees of the Trust provides well-being services covering mental health, health lifestyle, health conditions and healthy working to keep employees of the Trust in the best of health. It also allows employees the opportunity to claim money back for dental, optical and physiotherapy costs through its health cash plan in addition to providing access to counselling services/counsellors 24/7 and a direct line to a GP where needed. The Head of HR confirmed that new starters are sent a welcome email by Health Shield upon joining the Trust providing them with information on their employee benefits and how these can be accessed. This was confirmed to be placed on the staff intranet for all staff. To support this, the Head of HR confirmed that the Trust has employed the services of Thrive Mental Wellbeing through a mobile application that provides an array of tools that helps with intervention on a case-by-case basis. This additional service is provided through Health shield. The mobile application is accessible to all employees of the Trust and is designed to allow employees to talk through any stresses, worries or problems without barriers. At the time of this audit there were 13 employees currently active on the Thrive mobile application. The Head of HR confirmed that there may be more employees who have installed the application on their mobile phones but are not needing to use it currently. It was further stated that there was an issue with the mobile application where some members of staff complained that they were unable to download the application. This has, however, been fixed and is being communicated to staff so that they can access the application.



Discussions with the Head of HR confirmed that the Trust proactively reviews other issues such as those relating to finance, family, mental health or could make an employee suffer from mental health issues. In effectively managing this, a team of dedicated advisors are in place. These were confirmed to be trained advisors who can sign post employees to income related benefits whilst also informing them of support available. It was further confirmed, this is a confidential service that staff are able to access when needed.

Other Findings



The Trust has 19 MHFA. These are employees from different teams who provided initial support for employees experiencing signs or symptoms of mental health issues. They are required to meet bi-monthly to review support available to employees suffering from mental health issues in the workplace in a bid to create a plan that ensures those suffering can remain in work or return to work successfully. They also help with occupational health referrals and provide support advice and guidance for referrals. It was identified through testing that the new sets of MHFA were last trained in September 2023 by Shaw Trust. At the Trust festival in April 2023, the Shaw Trust attended to promote Mental Health First Aid in the workplace. This resulted in the Shaw Trust delivering MHFA refresher training to existing Mental Health First Aiders in May 2023 and to new Mental Health First aiders in September 2023. Further refresher training will take place in January 2024. The Trust has developed a MHFA Charter that lists their commitments and responsibilities.



Asclepius Occupational Health provides occupational health related services for employees of the Trust. They also act in the capacity of external advisors on health and wellbeing to the Trust. Following a need being identified, a form is completed by the relevant Line Manager and shared with HR who upload the details onto Asclepius's Portal. Upon receiving the details, Asclepius contact the relevant employee for discussion and a report is written for the interventions to be undertaken. Once the report is received by HR, this is shared with the Line Manager and the relevant employee to discuss outcomes and to agree to the interventions. Where this a mental health issue, it was confirmed that they offer bespoke counselling services relevant to the mental health issue faced by the employee.



A review of sickness absence data for the month ending November 2023 showed six open cases relating to stress/anxiety/depression. Testing was undertaken for all six cases. Appropriate interventions and support have been provided, which included referral to occupational health in five of the six cases. In relation to the sixth case, the employee is covered by a Fit Note until 25th December 2023 and welfare meetings are underway. Testing identified that all actions taken were appropriate in order to provide support to the staff members suffering from mental health related issues.



Delivery Risk:

Failure to deliver the service in an effective manner which meets the requirements of the organisation.

Ref	Expected Key Risk Mitigation		Effectiveness of arrangements	Cross Reference to MAP	Cross Reference to OEM
PM	Performance Monitoring	There are agreed KPIs for the process which align with the business plan requirements and are independently monitored, with corrective action taken in a timely manner.	In place	-	-
S	Sustainability	The impact on the organisation's sustainability agenda has been considered.	In place	-	-
R	Resilience	Good practice to respond to business interruption events and to enhance the economic, effective, and efficient delivery is adopted.	In place	-	-

Other Findings



The Human Resources Annual Report, shared with the Board of Trustees during their meeting in June 2023 for year ending 2022/23, noted that 491 (49%) of days lost were due to mental health. In one case of mental health absence which was work-related, the days lost was 118 days. The report confirmed that whilst mental health absence has reduced over the previous 12 months from 2.86% in 2021/22 to 2.67% in 2022/23, it is still the main reason for sickness absence and of major concern to the Trust as a whole. A further report confirmed that work related stress attributed to 256 days. It was further noted that of the 27 long term sickness absences attributed to mental health absence, 18 had returned to work. A range of interventions and support provided were listed in the report and these includes training of MHFA to support staff who experience mental health wellness issues.



Data for Quarter 2 showed that a total of 776 days were lost due to sickness absence across 12 categories. The category for stress/ anxiety/depression showed a total of 395 days lost (51% of the total). This was split between work related stress and other stress. 33 employees were off work in relation to this category. 14 were absent in the short term and 19 in the long term. The Asset and Compliance Team were seen to be performing inadequately in this area followed by Customer Operations and Property Team. Discussions with the Head of HR confirmed appropriate support had been provided to the employees in these teams. This included referral to occupational health who have recommended training, counselling, incremental phased returns, conducting of welfare meetings and use of the EAP. This is being monitored by the HR Team.



At the most recent staff survey conducted, staff were asked four questions in relation to wellbeing. 81% of employees confirmed they were satisfied with their physical working conditions and 56% of the staff confirmed that all was okay with their well-being.

Other Findings

The Trust is looking to make improvements from the outcome of the staff survey. These are to be incorporated into the Trust's Corporate Action Plan and shared with all staff. In addition, the Trust will also be undertaking a pulse survey in 2024 to assess staff engagement⁴ which will include health and wellbeing.



Where employees are on long-term sickness, HR Advisors conduct welfare meetings in a bid to encourage employees to return to work. HR Advisors also provide support and guidance to Line Managers to ensure that the relevant policies and procedures are followed and to ensure that employees with mental health issues are appropriately supported.



The Trust organised a staff festival in May 2023 where Shaw Trust was invited to promote MHFA refresher training to staff. It was confirmed that at the staff festival, members of staff expressed interest in becoming MHFAs. They were subsequently trained in September 2023.

EXPLANATORY INFORMATION

Appendix A

Scope and Limitations of the Review

1. The definition of the type of review, the limitations and the responsibilities of management in regard to this review are set out in the Annual Plan. As set out in the Audit Charter, substantive testing is only carried out where this has been agreed with management and unless explicitly shown in the scope no such work has been performed.

Disclaimer

2. The matters raised in this report are only those that came to the attention of the auditor during the course of the review, and are not necessarily a comprehensive statement of all the weaknesses that exist or all the improvements that might be made. This report has been prepared solely for management's use and must not be recited or referred to in whole or in part to third parties without our prior written consent. No responsibility to any third party is accepted as the report has not been prepared, and is not intended, for any other purpose. TIAA neither owes nor accepts any duty of care to any other party who may receive this report and specifically disclaims any liability for loss, damage or expense of whatsoever nature, which is caused by their reliance on our report.

Effectiveness of arrangements

3. The definitions of the effectiveness of arrangements are set out below. These are based solely upon the audit work performed, assume business as usual, and do not necessarily cover management override or exceptional circumstances.

In place	The control arrangements in place mitigate the risk from arising.
Partially in place	The control arrangements in place only partially mitigate the risk from arising.
Not in place	The control arrangements in place do not effectively mitigate the risk from arising.

Assurance Assessment

4. The definitions of the assurance assessments are:

Substantial Assurance	There is a robust system of internal controls operating effectively to ensure that risks are managed and process objectives achieved.
Reasonable Assurance	The system of internal controls is generally adequate and operating effectively but some improvements are required to ensure that risks are managed and process objectives achieved.
Limited Assurance	The system of internal controls is generally inadequate or not operating effectively and significant improvements are required to ensure that risks are managed and process objectives achieved.
No Assurance	There is a fundamental breakdown or absence of core internal controls requiring immediate action.

Acknowledgement

5. We would like to thank staff for their co-operation and assistance during the course of our work.

Release of Report

6. The table below sets out the history of this report.

Stage	Issued	Response Received
Audit Planning Memorandum:	3 rd May 2023	10 th May 2023
Draft Report:	18 th December 2023	3 rd January 2024
Final Report:	12 th January 2024	

AUDIT PLANNING MEMORANDUM

Appendix B

Client:	Southway Housing Trust		
Review:	Staff Mental Health and Wellbeing		
Type of Review:	Assurance	Audit Lead:	Ade Kosoko
Outline scope (per Annual Plan):	The review will appraise the approach to staff wellbeing including the initiatives in place to support staff suffering with mental health issues. This will include the preventative measures in place, support provided to staff, any intervention strategies and monitoring of staff absence.		
Detailed scope will consider:	The review will set out to provide assurance to the Audit and Risk Committee that the Trust has robust processes in place to for managing the mental health and wellbeing of staff. • The processes are supported by appropriate policies and procedures. • Appropriate support, advice and signposting has been made available to staff. • Regular monitoring of the process and its outcomes are undertaken with improvements identified and implemented where appropriate. • External advice is sought to supplement the Trust's offering. Appropriate reporting is provided to the Board/Committee in relation to the management of staff absence due to mental health issues.		
Planned Start Date:	27/11/2023	Exit Meeting Date:	14/12/2023
		Exit Meeting to be held with:	Nigel Shaw (Head of Human Resources)

SELF ASSESSMENT RESPONSE

Matters over the previous 12 months relating to activity to be reviewed	Y/N (if Y then please provide brief details separately)
Has there been any reduction in the effectiveness of the internal controls due to staff absences through sickness and/or vacancies etc?	N
Have there been any breakdowns in the internal controls resulting in disciplinary action or similar?	N
Have there been any significant changes to the process?	N
Are there any particular matters/periods of time you would like the review to consider?	N