



# Mental Health at Work Plan



**CMA**   
Competition & Markets Authority

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## Contents

	<i>Page</i>
Introduction .....	4
1. Our vision.....	5
2. A culture of openness and understanding.....	12
3. Building a healthy working environment.....	16
4. Providing effective support when colleagues need it .....	20
5. Taking responsibility for promoting positive mental health.....	22

## Introduction

Since mid-2016, when we set up our Wellbeing and Mental Health Action Group, the CMA has made a concerted effort to raise mental health awareness across our organisation. This has included creating and fulfilling an ambitious action plan to which we committed ourselves by signing the 'Time to Change' pledge in February 2017.



As part of this work, we have actively promoted conversations about mental health and wellbeing issues within the CMA, by for example hosting talks from CMA colleagues and external speakers, publishing blogs on mental health issues on our Intranet and running regular events such as our annual Wellbeing Week in October.

Drawing on the knowledge and experience we have gained from actions taken over the past two years, this Mental Health at Work Plan sets out our vision, reaffirms our commitment and describes the ongoing work the CMA is carrying out to promote good mental health in our workplace.

The CMA is not alone in taking mental health seriously. The need for all employers in the UK to develop a Mental Health at Work Plan was a key recommendation in the Thriving at Work [report](#) commissioned by the Prime Minister, Theresa May, from Lord Denis Stevenson and Paul Farmer, Chief Executive of Mind. Our plan draws on the evidence and insights set out in the Thriving at Work report, and sets out the specific actions that we are taking to implement the report's recommendations.

## 1. Our vision

Our vision is to foster a working culture that recognises and reflects the importance of good mental health and wellbeing and provides effective support when colleagues need it.

*What are we trying to achieve?*

We want the CMA to be recognised as a great place to work in terms of mental health and wellbeing. As part of our commitment, we will work together to:

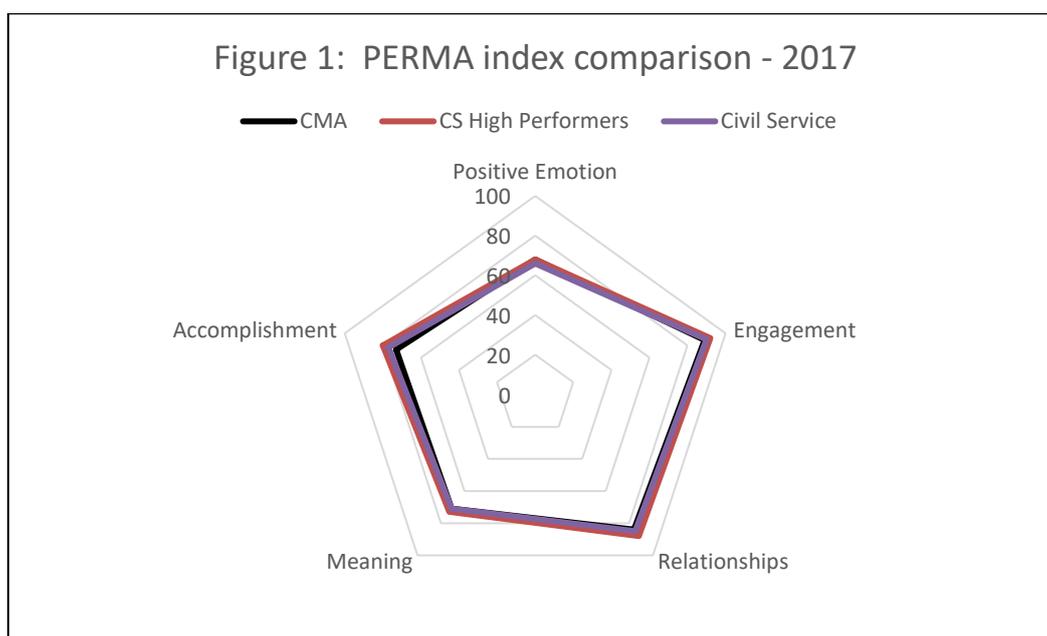
- raise our awareness of mental health and wellbeing issues and their impact
- improve our understanding of mental health and how we can help ourselves and each other to promote and maintain good mental health
- ensure CMA leaders and managers have the training and support to enable them to identify when team members may need additional support, build resilience in their teams and create an environment that promotes positive wellbeing
- demonstrate how supporting wellbeing and good mental health will benefit all individuals and the CMA
- identify and tackle stigma and discrimination, as part of our wider culture of embracing diversity and encouraging all colleagues to bring their whole selves to work
- create and foster a working culture:
  - that promotes good mental health and wellbeing
  - in which everyone feels able to talk about and access the support they need, whether for specific mental health issues or more general wellbeing
  - that proactively considers the impact of how we work and our working environment on our mental health and wellbeing
- embed mental health and wellbeing considerations into our everyday ways of working and how we manage change
- provide effective, timely and good quality support to colleagues who are experiencing mental health difficulties

## How are we doing now?

Like other Government Departments, the CMA uses the data collected as part of the annual Civil Service People Survey to track employee wellbeing by reference to the following two indicators:

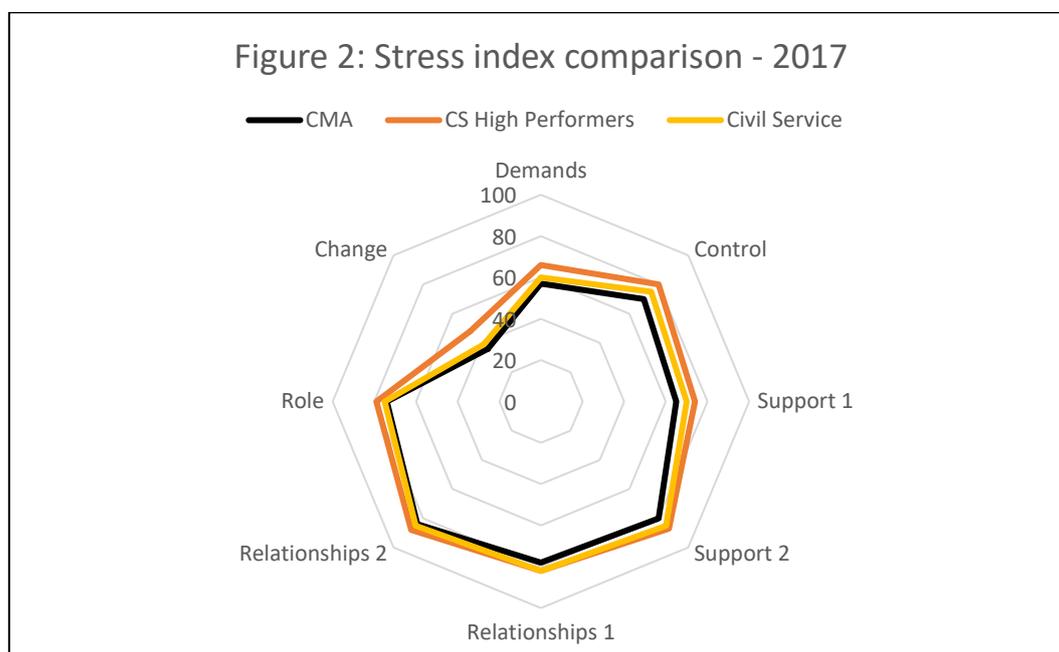
- positive wellbeing, tracking the extent to which employees are 'flourishing' in the work place – this uses the PERMA index, which uses People Survey results to measures five dimensions of positive wellbeing: Positive Emotion, Engagement, Relationships, Meaning and Accomplishment;
- stress – this uses the 'Proxy' HSE Stress Management Standard Index, which aligns to the Health and Safety Executive's stress management tool using 8 questions from the People Survey covering different drivers of stress.

Figure 1 below shows the CMA's performance against the components making up the PERMA index, relative to the civil service average and high performing units. This measures workplace factors conducive to positive wellbeing, such that a higher score represents a more positive environment in terms of wellbeing.



The PERMA index for the CMA in 2017 was 77%, slightly below the Civil Service average of 79%. One area for improvement highlighted by this analysis relates to accomplishment, where 73% of CMA colleagues agreed with the statement: 'My work gives me a sense of personal accomplishment' compared with a civil service average of 77% and 80% for high performing units. The CMA's PERMA index decreased between 2014 and 2016, followed by a modest increase between 2016 and 2017.

Figure 2 below shows the CMA's performance against a stress index, relative to the civil service average and high performing units. As with the PERMA index, this chart is represented in positive terms – i.e. a higher index score represents a less stressful environment.



In 2017, the overall positive score for the CMA was 68% whereas the Civil service average was 71% with high performers averaging 76%. This indicates that the CMA is currently a somewhat more stressful environment than the civil service overall. Two areas for improvement highlighted by this analysis relate to:

- ability to influence change ('Change') – 36% of CMA colleagues agreed with the statement: "I have the opportunity to contribute my views before decisions are made that affect me." compared with a civil service average of 39% and 48% among high performing units, and;
- respect ('Support 2') – 80% of CMA colleagues agreed with the statement: 'I am treated with respect by the people I work with.' Compared with a civil service average of 85% and 87% among high performing units;

Looking at the index over time suggests that the CMA has become a slightly more stressful environment between 2015 and 2017, although the change over this period has been relatively small.

In addition to using the People Survey to track performance and compare against other organisations, we conducted an in-house pulse survey in March and April 2017, to which 211 CMA colleagues (over a third of the organisation) responded. This gave the following results:

- just over 1/3 of respondents indicated that they had experienced mental health difficulties (although it is possible that people with an interest in wellbeing and mental health issues were more likely to complete the survey). The Stevenson and Farmer report estimates that around 15% of people at work have symptoms of an existing mental health condition; <sup>1</sup>
- in terms of the CMA's overall attitude to mental health, the majority of respondents (70%) agreed that the CMA is supportive about issues impacting mental health. However, a small proportion (13%) disagreed, and 39% felt that the CMA could be more respectful towards people with people with mental health difficulties;
- there was room for improvement in the CMA's culture and openness on issues affecting mental wellbeing: almost half of respondents said they would feel uncomfortable talking to their manager about such issues, while six out of ten respondents said they would feel uncomfortable talking to their work colleagues; and
- there was a lack of awareness amongst some respondents about how to access support within the CMA for mental wellbeing issues – for example, 25% of respondents did not know how to access support, and 39% of respondents were not aware of the CMA's Employee Assistance Programme.

## **What will success look like?**

We will know that we are achieving our vision when:

- our senior leaders understand how they can create an environment that supports good mental health and wellbeing and act as positive role models,
- all managers in the CMA are equipped to:
  - have conversations about wellbeing and mental health
  - be aware of the warning signs of fragile mental health or wellbeing problems
  - support their staff to look after themselves and each other
  - signpost more tailored support when needed

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<sup>1</sup> *Thriving at Work: The Stevenson/Farmer review of mental health and employment* (p19)

- all employees are attentive to their own mental health and feel able to be open with their managers and other colleagues about their experiences and needs, and know how and where they can access information, advice and support; and
- mental health and wellbeing outcomes improve – indicated by improved scores on the PERMA index and subsequent pulse surveys.

These factors will contribute to an organisational culture that helps prevent mental illness being caused or worsened by work and equips everybody – including colleagues who have an existing mental illness - to thrive.

## **The benefits to the CMA of promoting good mental health**

Taking steps to promote good mental health for staff is both the right thing to do and will improve the CMA as an employer, making it a place people will want to work and maximising the productivity and engagement of our employees.

The case for investment in mental health and wellbeing is strong, promoting good mental health at work can lead to:

- less absenteeism - over the last decade, UK workplace absence has fallen overall but the proportion of days lost to poor mental health has risen by 5% (this is especially notable given employee unwillingness to disclose mental health conditions).<sup>2</sup> As well as enabling earlier interventions, robust mental health policies will support those colleagues who are experiencing difficulties to make a faster and smoother transition back to work from a period of absence;
- less presenteeism – this arises when colleagues attend work whilst ill, in this context with poor mental health, and therefore do not perform to their full ability. Deloitte estimates presenteeism is costing employers up to three times the cost of absences for reasons of poor mental health;<sup>3</sup>
- successful recruitment and growth – the CMA is expanding. Current and potential employees value sound mental health and wellbeing policies, flexible working and work/life balance as core components of any employment offer;
- better retention – providing an environment in which employees can look after their own mental health effectively and supporting colleagues through difficult times can help reduce mental health-related turnover costs. Studies suggest higher skilled jobs – such as those at the CMA - will incur greater turnover costs

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<sup>2</sup> *Thriving at Work* (p20)

<sup>3</sup> *Thriving at Work* (p24)

due to the resources needed to find the right candidate and the transitional reductions in output as new employees learn the job; and

- higher productivity - mentally healthier employees are happier and more productive employees.

Sound mental health practices can prevent problems arising in the first place and allow them to be addressed early, before they become more harmful. By creating an environment and a culture where people feel comfortable talking about their mental health and asking for support, there will be a much greater chance that people will ask for support earlier and be able to remain at or return to work.

## **The CMA's approach to promoting good mental health**

Our approach is to integrate good mental health practices into our everyday operations at all levels of the organisation. This is for all staff and includes setting clear expectations of senior leaders and managers, as well as encouraging all CMA colleagues to take care of their own mental health and wellbeing and to respect that of others.

The CMA will facilitate this by providing resources and guidance to all colleagues, in particular to support managers in addressing wellbeing issues and to provide individual support where needed. The CMA will also run a regular programme of mental health and wellbeing-related events to raise awareness and support cultural change.

In the rest of this document, we summarise the key elements of our approach. These are informed by the recommendations in the [Thriving at Work report](#) and set out the steps we are taking as an organisation to meet those recommendations.

The three main focus areas of our Mental Health at Work Plan are:

1. developing a culture of openness and understanding,
2. building a healthy working environment,
3. providing effective support when colleagues need it.

The rest of the document is structured as follows:

- section 2 sets out how the CMA is looking to develop an organisational culture in which staff are aware of and able to talk openly about mental health and wellbeing issues;

- section 3 describes what the CMA is doing to provide its employees with good working conditions, ensuring they have a healthy work life balance and development opportunities, and promote effective people management to support the mental health and wellbeing of all employees;
- section 4 sets out how the CMA provides support to colleagues who need it;
- section 5 sets out how the CMA is moving towards meeting the more ambitious 'enhanced standards' identified in the Thriving at Work report, to lead the way in promoting positive mental health across the organisation.

## 2. A culture of openness and understanding

By developing a culture of openness and understanding, the CMA is looking to build an environment in which all employees are better able to identify, discuss and address mental health and wellbeing issues.

Our approach and this plan does not specify a limiting definition on what constitutes a mental health or wellbeing issue. Everybody's mental health is important and we want create a culture where all our people feel able to raise any issue that is having a negative impact on their wellbeing. This is irrespective of whether the issue is perceived as being small or large, temporary or permanent, or whether the issue originates at or outside of work. If something is affecting a person's ability to thrive at work, they should feel able to raise it, be listened to and to know that it will be received kindly and taken seriously.

### Developing mental health awareness

We all have mental health, just as we all have physical health. Raising awareness of maintaining mental health is therefore important to everyone.

The CMA is committed to continued efforts to develop mental health awareness for all.

The CMA will:

- maintain its support for the Wellbeing and Mental Health Action Group, which will continue to deliver a programme of:
  - keystone events including an annual Wellbeing Week and Time to Talk day;
  - CMA colleagues and external speakers sharing their lived experiences of mental health and wellbeing issues, including through the 'Tea and Talk' programme<sup>4</sup>;

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<sup>4</sup> This programme involves colleagues from across the CMA sharing their personal experiences of wellbeing and mental health issues. The format varies according to the speaker and the issue. One of the main aims being to remove the stigma surrounding talking about mental health and 'normalise' the act of discussing challenges with colleagues.

- internal and external communications to raise mental health awareness, including blogs on the intranet and on the CMA’s public website.
- incorporate mental health and wellbeing as a theme in the CMA’s induction programme for new starters, as well as in the CMA’s introduction to management programme;
- invest in training for colleagues at all levels, including providing access to a suite of wellbeing and mental health-related training for leaders and managers, mental health awareness training as a core course for front-line managers and regular resilience training for all staff (see section 3)<sup>5</sup>;
- maintain and promote the CMA’s wellbeing toolkit and other online resources for colleagues to access information about mental health and wellbeing, and;
- learn from and share with others – we will evolve our approach over time by looking across the UK Civil Service, private practice and our national and international partners for inspiration and best-practice in promoting and supporting mental health and wellbeing.

## Encouraging open conversations

Raising awareness of mental health issues is only part of the story. We should all be able to talk openly about mental health, so that we are able to access support when we are struggling.

The CMA is committed to encouraging open conversations about mental health, to this end, the CMA will:

- maintain its commitment to the [Time to Change pledge](#), which was signed on 1<sup>st</sup> February 2017;
- maintain its support for the Mental Health First Aiders programme, including ensuring that there are enough trained mental health first aiders to support staff at the CMA;
- support, promote and evolve the Wellbeing Peer Support Network; and

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<sup>5</sup> By providing a range of learning opportunities, the CMA will seek to meet the ambitious civil service target of delivering wellbeing training to 90% of Senior Civil Servants by March 2019.

- encourage and support managers to have ongoing conversations about wellbeing and mental health with everyone they manage, not just those experiencing mental health difficulties. This could be as simple as ‘checking in’ about how colleagues are feeling during regular catch up meetings.

## **Improving the disclosure process**

Research has shown that many employees are reluctant to raise issues of stress or mental ill health with their managers due to fear of discrimination. Likewise, managers may be reluctant to raise the issue, because they feel uncomfortable, for fear of making matters worse or risking a discrimination claim.

Talented candidates from all walks of life should feel able to apply for roles at the CMA, whether or not they have suffered from mental ill health. CMA colleagues need to feel confident that there will be no negative consequences if they disclose stress or mental health issues to their manager or anyone else at the CMA. Equally, managers need to feel confident that they can handle conversations about mental health appropriately, both during the recruitment process and throughout the lifecycle of employment.

The CMA is committed to:

- facilitating conversations between managers and employees about stress and mental health;
- maintaining support for employees so that they can stay well and in work; and
- operating a Workplace Adjustment Passport scheme, so that colleagues with mental health difficulties should not have to explain their needs and reasonable adjustments, every time they move roles within the CMA or the civil service.

In growing the organisation over the coming years, the CMA will adopt recruitment processes ensuring that:

- we communicate our commitment to equal opportunities, including in the job advert;
- we make clear in adverts and interviews that the organisation values employees’ wellbeing and mental health;
- job adverts focus on the requirements of the role and what needs to be done, rather than on specific personality traits;

- colleagues involved in recruitment are properly trained to ensure that candidates are not subject to bias or discrimination during the process; and
- candidates are able to disclose pre-existing mental health conditions in confidence, so that any reasonable adjustments can be made on appointment.

The CMA will also encourage voluntary disclosure of mental health conditions and support colleagues to stay well and in work by:

- continuing to train managers to recognise mental health issues;
- raising awareness of the Workplace Adjustment Passport scheme so that conversations about mental health are constructive and lead to practical support.

### **3. Building a healthy working environment**

Creating a working environment that promotes both physical and mental health is important to colleagues' overall wellbeing and, as a result, productivity. The CMA will seek to understand and implement best practice in our working conditions, this includes both our physical environment and our wider organisational culture and ways of working. A healthy working environment includes a positive working experience which means being attentive to issues such as autonomy, work-life balance and opportunities for learning, development and progression.

#### **Providing good physical working conditions**

The CMA will seek to develop our physical working environment to enhance our employees' wellbeing, taking the opportunities presented by the significant expansion of our Edinburgh office this year and the London office move expected in 2019, as well as the recent improvements to our IT infrastructure.

The office moves provide the opportunity to think about the features of an office environment that makes for a healthy, enjoyable and productive workplace. The CMA is aiming that its new London office will satisfy the WELL Building Standards. The CMA will seek to ensure, including through staff consultation and the involvement of the Wellbeing and Mental Health Action Group, that proposals for the design of our new work space take account of features that can positively affect health and wellbeing, including air quality, temperature, access to light and quiet areas, and the value of spaces where people can socialise.

Further issues that will be considered as part of the office moves include:

- spaces to encourage interaction and the development of constructive working relationships without disturbing others and, more generally, that allow people to socialise;
- how to provide people with privacy and quietness when needed to have sensitive conversations and to facilitate focus and 'flow' when working on complex tasks;
- how the workspace design can encourage people to move about the office in ways that make for a healthier and more integrated workplace; and
- the type of furniture that could be made available – including, for example, the benefits of 'standing desks' or other health - promoting equipment and how access to these facilities might be managed.

The CMA will also consider how to optimise usage of our new IT infrastructure (e.g. Skyping facilities on laptops and video-conferencing facilities in meeting rooms) to make for a better working environment, particularly in light of the expansion of the Edinburgh office and planning for the London office move.

## **Organisational culture and ways of working**

Organisational culture and working practices are just as important as the physical environment in promoting wellbeing and good mental health.

As part of its Corporate Action Plan and its wider commitment to equality, diversity and inclusion, the CMA is taking steps to build an organisational culture based on the principle of respect, to support colleagues in achieving a healthy work-life balance, to emphasise the importance of wellbeing in effective people management and help all CMA colleagues pursue personal and career development goals. Our performance against these commitments are published in the CMA's [Annual Report](#).

### **Respect**

The CMA is committed to treating everyone with respect and to ensuring that our workplace is free of bullying, harassment and discrimination.

As part of this commitment we will:

- encourage and enable colleagues to do their best, acknowledge and value diversity, and listen to different views with courtesy;
- give and receive honest, objective and supportive feedback in a mutually respectful way, with a genuine intention to assist each other's development; and
- take seriously concerns about inappropriate behaviour and will respond appropriately.

Alignment with this commitment will form part of everybody's objectives and everyone working at the CMA will undertake mandatory on-line training. The CMA's General Counsel, Sarah Cardell will act as Board Respect Champion to ensure that this commitment is honoured at all levels of the organisation.

## **Work-life balance**

The CMA recognises the importance of attracting and retaining a diverse employee base and of helping all colleagues achieve a healthy work-life balance.

As part of this, the CMA will maintain its support for flexible working arrangements and, through the work of our Equality and Diversity and Inclusion working group, will examine how effectively such arrangements are being put in place across the CMA. During the coming year, we will consider whether these arrangements are meeting the needs of both employees and the organisation, whether the opportunity to work flexibly is being offered fairly and whether the arrangements are likely to remain fit for purpose in the future. We want to ensure that the CMA stands out as an attractive and supportive employer as we look to grow the organisation and offer existing and prospective employees the flexibility that they seek.

The CMA will also promote good practice by being alert and responsive to long or excessive working hours and accommodating employees' individual work preferences and arrangements, for example:

- recognising the need for people to take breaks,
- seeking to avoid lunchtime meetings and meetings outside 'core hours'; and
- promoting best practice on remote and part time working – for example, encouraging all colleagues to communicate their normal working hours, and taking an inclusive approach to running meetings, when colleagues are attending remotely (e.g by phone or on Skype).

## **People management**

Over the past 18 months, the CMA has provided a half day mental health awareness training course, run by Mind, to around 70 managers and senior staff. It has also run a two-day accredited training course as Mental Health First Aiders (MHFAs) and run by Rethink.. The CMA has revised its Project Management Framework to incorporate a greater focus on people management and wellbeing.

As part of our Corporate Action Plan, the CMA is developing a management development programme, which will include a focus on promoting wellbeing and good mental health. Such training is an important means of ensuring that all employees have access to support from line managers and other colleagues for their mental health and wellbeing.

As part of this programme, The CMA will:

- continue to provide mental health awareness training to managers and other colleagues
- provide access to training packages for managers which will include resilience, positive wellbeing and managing effective teams
- provide more general people management training to ensure that staff are equipped to give and receive feedback, which can help managers and supervisors be aware of when additional support may be required
- revisit roles and responsibilities to ensure good communication between work and staff managers to ensure multiple projects or expectations arising from the CMA's Matrix management framework do not adversely affect mental health or wellbeing
- continue to liaise, through the Wellbeing and Mental Health and Action Group, with Mind and other similar organisations to identify good training opportunities relating to mental health and wellbeing

## **Opportunities for development**

Opportunities for career progression and personal development are important aspects of enabling colleagues to thrive at work.

The CMA is expecting to expand staff numbers substantially over the coming years and will be aiming to create good opportunities for colleagues to progress, learn and develop.

To support colleagues in achieving their potential, the CMA will promote regular, good quality, career development conversations, based on the 'depth, breadth, stretch' model and will provide further opportunities, for example through mentoring, job coaching, job-shadowing, secondments and 'buddying' schemes.

## 4. Providing effective support when colleagues need it

By providing appropriate and timely support for colleagues who need it, the CMA can minimise the impact of work on employees' mental health and wellbeing, and reduce the negative effects of mental ill-health on the CMA's ability to deliver its objectives.

This involves equipping individuals with diagnosed mental health conditions to thrive, as well as providing timely help that can assist in reducing sickness absence and presenteeism resulting from mental ill health.

In addition to the work we are doing to raise awareness of mental health issues among front-line managers (see section 3), the CMA also offers access to expert mental health support through its occupational health and employee assistance programmes and has trained mental health first aiders as an additional point of contact.

### **Provision of tailored in-house mental health support and signposting to clinical help**

All CMA staff have access to the Employee Assistance Programme (EAP), a service offered by an external provider. Colleagues can call a free number at any time of day or night and discuss (in confidence) any difficulties they may be going through, whether at home or work, and receive impartial advice. As part of this service, any member of CMA staff is automatically entitled to up to six counselling sessions. Further support may also be available subject to referral.

The CMA has an early intervention initiative when managing well-being in the workplace. If staff have health concerns or have returned from a long spell of absence, the HR team works with the staff member and manager to complete an occupational health (OH) referral. The report provides recommendations on what the CMA can do to help the staff member and manager manage their condition by putting in place reasonable adjustments.

The OH and EAP services will shortly be provided on a combined basis to facilitate integration between the two. In the coming year, we will prioritise raising awareness of these services, so that all colleagues are aware of the support available. We will also be considering our approach to further support beyond the initial counselling sessions available under the EAP.

## **Mental health first aiders**

The CMA has more than 20 trained mental health first aiders who are able to provide support to staff who would like to talk to someone in confidence and to signpost people to sources of additional support. We will seek to promote their availability and offer confidential, non-judgemental listening to all colleagues. The CMA will continue to ensure we have sufficient mental health first aiders to provide this support, including in the expanded Scotland office. To this end we plan to train up to 40 further mental health first aiders before March 2018.

## **Wellbeing peer support network**

The CMA has a wellbeing support network designed to provide peer support to staff in relation to emotional wellbeing and mental health. It provides a further outlet for non-judgemental listening, giving colleagues an opportunity to meet others who may have had similar experiences and challenges and to share thoughts and suggestions on coping techniques and support options.

## 5. Taking responsibility for promoting positive mental health

The CMA's ambition is to be recognised as an excellent employer in terms of promoting positive mental health. To do this, we need to take responsibility at all levels of the organisation, to track our progress over time and relative to other organisations and to put in place structures that embed mental health awareness into our everyday working environment.

To meet this aim and satisfy the enhanced standards identified in the [Thriving at Work report](#), we are taking the following steps.

### **Demonstrating accountability**

Promoting positive mental health is an important priority for everybody at the CMA. Some key roles and responsibilities are as follows:

- the Chief Executive of the CMA, Andrea Coscelli, and his Executive Committee are accountable for safeguarding the wellbeing of CMA employees including supporting their mental health;
- all CMA managers are similarly responsible for looking out for the wellbeing of colleagues who report to them, or who work on projects they run;
- the CMA's HR department is accountable for developing and operating policies to support wellbeing and for ensuring the availability of key support services; and
- the CMA's Wellbeing and Mental Health Action Group, led by Adam Land, the CMA's Senior Wellbeing Champion, provides a focus and a forum for driving forward standards and for delivering initiatives.

### **Monitoring employee wellbeing and reporting on progress**

We propose to track progress and report on performance against our Mental Health at Work Plan as follows:

- we will use the results of the staff survey to report annually on performance against the PERMA and Stress indicators set out in the Wellbeing Dashboard. This identifies the drivers that affect various dimensions of mental health which would help to identify areas of focus for improvement and priorities;

- every two years we will carry out a more focussed quick survey ('pulse survey') to drill further into mental health and wellbeing issues. The first such survey was conducted in April 2017;
- HR report on a quarterly basis to the CMA's Executive Committee on absence levels and reasons for absence. We will be reviewing the format of our organisational health dashboard and will also be looking at whether we can improve the coding of reasons for absence to ensure more accurate and useful reporting, and;
- we will report annually to the Board on performance and activity. This will enable us to project CMA's commitment and external accountability for improving the wellbeing and mental health of our colleagues. This Board report and a note of the discussion will then be published on the intranet inviting comment;
- we will also update on activities and outcomes in our Annual Report.