ics Accounting

Mental Health & Wellbeing Policy



Mental Health & Wellbeing Policy
CIS Subcontractors

Independent Contractor Services Ltd (the Company) recognises that mental health and wellbeing are important aspects of a safe and productive working environment.

Our work, particularly within the construction and rail industries, can involve demanding working conditions, long or unusual hours, night work, travelling, working away from home, safety-critical activities and, on occasion, exposure to potentially traumatic incidents.
This policy sets out how Independent Contractor Services Ltd will promote good mental health and wellbeing and how concerns can be raised by individuals carrying out work for or on behalf of the Company.

This policy applies to individuals engaged by Independent Contractor Services Ltd under a subcontractor agreement, including CIS-registered subcontractors and other self-employed contractors.
Nothing in this policy changes or determines the employment status of any individual. Individuals covered by this policy remain responsible for their own business, tax and National Insurance obligations in accordance with the subcontractor agreement.

Our Approach

Independent Contractor Services Ltd aims to:

- promote an open and respectful approach to mental health;
- encourage individuals to raise concerns before they become more serious;
- identify and manage work-related factors that may adversely affect mental wellbeing;
- recognise the importance of adequate rest and fatigue management;
- provide appropriate signposting to sources of support;
- maintain confidentiality when concerns are raised, subject to legal and safety requirements;
- avoid discrimination or inappropriate treatment because an individual has raised a genuine health or wellbeing concern; and
- maintain a safe working environment for everyone affected by our activities.

We encourage subcontractors to take reasonable steps to look after their own physical and mental wellbeing and to notify the Company where a health or wellbeing issue may affect their ability to undertake work safely.

Mental Health Concerns

Mental health concerns can include, but are not limited to:

- stress;
- anxiety;
- low mood;

- depression;
- difficulty sleeping;
- work-related pressure;
- problems arising from working patterns or excessive hours;
- difficulties associated with working away from home;
- the effects of a traumatic incident;
- fatigue or reduced alertness; and
- personal circumstances that may affect an individual's ability to work safely.

A person does not need to have a diagnosed mental health condition before raising a concern.

Raising a Concern

A subcontractor or contractor who is experiencing a mental health, wellbeing or fatigue concern is encouraged to speak with:

Primary contact: HR & Compliance
Telephone: 01524 580720
Email: people@icsuk.com

Where the concern relates to an immediate safety risk, the individual must stop or avoid undertaking the relevant activity and notify the appropriate person in accordance with the site, project or railway safety arrangements.

No individual is expected to continue safety-critical work where they reasonably believe that they are not fit to do so safely.

Fitness for work and safety

Everyone working on behalf of the Company has a responsibility to ensure that they are fit to undertake the activities they have agreed to perform.

Individuals must not undertake work where they are impaired by:

- fatigue;
- lack of sleep;
- alcohol or drugs;
- medication or other substances where these affect their ability to work safely;
- significant stress or emotional distress; or
- any other physical or mental condition that could reasonably affect their ability to carry out safety-critical work safely.

Where a concern is identified, the Company may require the individual to cease or postpone the relevant activity and follow the applicable project, client, site or railway safety arrangements. The Company may also have to inform the agency and/or client in respect of this.

This is a safety requirement and does not constitute an employee sickness-management process.

Fatigue Management

Fatigue can affect concentration, reaction time, judgement and decision-making and can therefore present a significant safety risk, particularly in rail and other safety-critical environments.

Individuals are expected to manage their working time and rest appropriately and must raise concerns where fatigue could affect safe working.

Where Independent Contractor Services Ltd controls or influences working arrangements, it will take reasonable steps to consider fatigue risk, including:

- working hours;
- night work;
- consecutive shifts;
- rest periods;
- travel time;
- excessive overtime or extended working;
- the nature of the work being undertaken; and
- the safety-critical nature of the activity.

Where rail industry, client or Network Rail requirements impose specific fatigue controls, those requirements must also be followed. Please ensure you read any rail / client policies in full and follow these requirements strictly.

Rail Specific Requirement

Where individuals are engaged on railway infrastructure or railway-related work, they must comply with all applicable railway safety requirements, including relevant requirements imposed by the infrastructure manager, principal contractor, client, site rules, competence arrangements and applicable railway standards.
Where applicable, individuals must maintain the required competence, certification, medical fitness and safety documentation for the work being undertaken.
For work falling within Network Rail arrangements, this may include applicable Sentinel requirements and relevant competence and medical standards.
Mental health or wellbeing concerns must not be ignored where they could affect an individual's ability to safely undertake safety-critical work.
Independent Contractor Services Ltd will cooperate with the relevant client, principal contractor or infrastructure manager where a safety concern needs to be managed under their railway safety arrangements.

Potentially Traumatic Incidents

Railway work (and construction activities) can expose individuals to potentially traumatic events. Where an individual is involved in or witnesses a potentially traumatic incident, they should notify the appropriate site/project contact as soon as reasonably practicable.

The Company's response will take account of the circumstances of the incident and any applicable client, principal contractor, infrastructure manager or railway procedures.
Where appropriate, Independent Contractor Services Ltd will signpost the individual towards professional or specialist support.
Individuals should not feel that they have to manage the effects of a traumatic incident alone.

Confidentiality

Information concerning an individual's health or wellbeing will be treated sensitively and confidentially.
Information will only be shared where there is a legitimate reason to do so, such as:

- protecting the health and safety of the individual or others;
- complying with a legal or contractual requirement;
- complying with railway safety or competence requirements;
- obtaining appropriate professional or occupational health advice, where applicable; or
- with the individual's consent, where appropriate.

Health information will not routinely be shared with other subcontractors or unnecessary personnel.

Support and Signposting

Independent Contractor Services Ltd will maintain a list of appropriate sources of support and may signpost individuals to services such as:

- their GP;
- NHS mental health services;
- NHS 111 where appropriate;
- Samaritans;
- occupational health services where available;
- rail industry wellbeing resources;
- client or principal contractor support services; and
- other recognised professional support organisations.

Where an individual is in immediate danger or believes they may be at risk of harming themselves or another person, emergency services or appropriate urgent medical assistance should be contacted.

Independent Contractor Services Ltd recommends Light House Charity, a free 24/7 support service specific to construction.

Light House Charity

https://lighthousecharity.org/
0345 605 1956 / 1800 939 122
(Online chat may also be available)

You may also benefit from construction charities such as:

Mates in Mind

https://www.matesinmind.org/
0203 510 5018

Communication and Awareness

Independent Contractor Services Ltd will make reasonable efforts to ensure that subcontractors and contractors are aware of:

- this policy;
- how to raise a wellbeing concern;
- fatigue risks;
- the importance of fitness for work;
- applicable rail safety requirements; and
- available sources of support.

Information may be provided during onboarding, newsletters or other appropriate communications.

Responsibilities
Company Management

Management is responsible for:

- promoting a positive approach to mental health and wellbeing;
- ensuring relevant personnel know how to respond to concerns;
- considering mental health and fatigue within relevant risk assessments;
- complying with applicable health and safety and railway requirements; and
- reviewing this policy periodically.

Subcontractors and contractors

Individuals engaged under a subcontractor agreement are responsible for:

- taking reasonable care of their own health and safety;
    - when providing a substitute, they should ensure the relevant provisions are also put in place;
- considering whether they are fit to undertake the work safely;
- managing their own working arrangements and rest appropriately;
- complying with applicable site, client and railway requirements;
- reporting relevant safety concerns; and
- seeking appropriate professional assistance where necessary.

No adverse treatment for raising genuine safety concerns

Independent Contractor Services Ltd encourages individuals to raise genuine health, wellbeing and fatigue concerns. Whether this be to the Company, client or agency.

A person should not be discouraged from raising a genuine safety concern.
However, nothing in this policy prevents Independent Contractor Services Ltd from taking appropriate action where an individual is unable to meet the competence, safety, contractual or other legitimate requirements of a particular engagement.

Document Control

This policy will be reviewed periodically and following significant changes to legislation, railway requirements, company activities or contractual arrangements.

Date & Comments	Reviewed by	Next Review Due
21/09/2026 Document Created	JM	01/09/2027

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2026

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