

*Royal Society for the Prevention of Accidents*  
**National Occupational Safety and Health Committee**  
**Comments on ‘Adapting to change in work and society: a new  
Community strategy on health and safety at work 2002 – 2006’**  
**[COM (2002) 118 final]**

## **Introduction**

RoSPA welcomes publication of ‘*Adapting to change in work and society: a new Community strategy on health and safety at work 2002 – 2006*’. The Society welcomes particularly the twin themes in the document of focusing on contemporary challenges in the changing world of work and linking health and safety at work with broader related EU wide policy agendas.

RoSPA takes the view that, just as in the UK, while there is case for expanding the EU legislative base for OS&H at various points, adapting legislation to technical change and further developing standards and authoritative guidance, the main thrust of future EU action in this field must be focused on ‘making H&S happen’. The key instruments here must be non-legislative measures and other initiatives which involve ‘key players’ working in closer partnership. The strategy therefore must focus on how H&S objectives can be linked effectively with all public health, environmental, education, road safety etc strategies at both Member State (MS) and EU levels.

Effective management of health and safety risk goes to the heart of the way businesses are managed. Not only is the protection of workers important as a key social objective in its own right but businesses which can manage health and safety risks systematically are more likely to enjoy reduced losses, greater productivity, better industrial relations, enhanced innovation and stronger corporate reputation. Robust and proportionate management of health and safety risks must be seen as a key element in the management of business risks generally, a surrogate for overall effectiveness and an enabler rather than inhibitor of overall commercial success. This message needs strong endorsement at the highest decision making levels within the EU and by all senior political figures in MSs.

Action is needed in certain high-risk sectors and in many of the new MSs to bring standards of health and safety up to a common level, both to save lives and reduce costs and to create a level playing field for business (in reality rather than just on paper). There is also a need to address work related road safety as a priority issue within the new strategy and in future statistics on work related road injuries (WoRRIs) need to be included in the EU H&S statistical data base.

RoSPA strongly supports an enlarged role for the European Agency for Health and Safety at Work in Bilbao.

This note sets out a series of broad strategic ideas and suggestions which could be incorporated within the above document.

## **1) STRATEGIC ISSUES**

- **Improvement targets**

RoSPA is pleased that the document envisages setting national targets. These need to be evidence based, with framework guidance for setting sector and enterprise targets on the basis of social dialogue. There is a need for special guidance for SMEs on simple approaches to target setting. RoSPA would favour simple H&S ‘action plan’ requirements for SMEs instead of written risk assessments and H&S policy statements. SME’s need to be freed from bureaucracy associated with regulation or those third party H&S management processes that are only appropriate for larger concerns.

- **Progress reporting**

RoSPA strongly supports the idea of giving a stronger ‘observer’ role to the Bilbao Foundation. All Member States should be required to produce an annual OS&H progress report. These should include occupational health as well as safety performance indicators. RoSPA would like to see a series of EU wide H&S performance league tables.

- **Getting Government employers to lead by example**

The strategy needs to get all Government employers in MSs to commit to exemplary, best practice standards in the way they manage the H&S of those they employ directly, to report on progress against targets and to insist on high H&S standards in all Government and EU procurement processes. The Bilbao Agency should be empowered to review and report on adherence to this policy by Governments in MSs.

- **Partnerships and twinning**

RoSPA strongly supports the idea of H&S twinning between MSs, not just at the Governmental level but at sector, enterprise and NGO levels too.

## **2) ENHANCING HEALTH AND SAFETY MANAGEMENT**

- **Common EU H&S management standards**

The Bilbao Agency should be asked to prepare a series of indicative, EU wide H&S management standards, drawing, for example, on the ILO ‘s work in this area. This should be accompanied by advice on best practice standards for auditing tools, with special approaches for SMEs which avoid inappropriate bureaucracy. There should be a debate on the merits or otherwise of an EU H&S management certification system.

- **Enhancing leadership of OS&H management**

Such standards should also include indicative guidance on the appointment of co-coordinator/champion directors for OS&H at board level with a code of good practice for director action on H&S.

- **Competence benchmarks**

Similarly they should contain assessment tools to help define standards for H&S competence, especially for directors and senior managers.

- **Performance measurement and reporting**

The same guidance should also address an holistic approach to OS&H performance measurement and performance reporting by organisations across the EU, both internally within the enterprise and externally to key stakeholders. The Bilbao Agency should develop an EU wide GoPOP regime (visit [www.gopop.org.uk](http://www.gopop.org.uk)). A series on EU H&S management key performance indicators are required which encompass inputs, outputs and outcomes.

- **Empowering workforce representatives**

The Agency should prepare best practice advice on involvement of both safety reps and workers as individuals (as appropriate) in key aspects of safety management (e.g. risk assessment, accident/incident investigation, performance review/target setting and audit)

- **Shared learning from accidents and incidents**

Enhanced approaches are needed at EU level to promote joint employer/employee learning from accidents. (Accidents are a largely wasted safety learning opportunity across the whole EU. Team based investigation, supported where necessary by experts, overcomes barriers and enriches safety outcomes. The Agency should be urged to develop an EU wide SADIE system visit [http://step.steel-sci.org/SADIE/main\\_sadie\\_fs.htm](http://step.steel-sci.org/SADIE/main_sadie_fs.htm) to facilitate case study learning from accidents and incidents. RoSPA commends DORI (Definition of Organisational Readiness to Investigate) recently launched in partnership with NRI (Noordwijk Risk Initiative) (visit <http://www.nri.eu.com/toppage4.htm> ).

- **Costing accidents and ill health**

A pan European protocol ('Ready Reckoner') on costing accidents/incidents/ill health should be developed (linked to targets and reporting - see above).

- **Influence via the supply chain**

Any new guidance on H&S management needs to include guidance for clients on how and why to influence and support development of better H&S standards in SMEs via contracting processes. The EU needs to invest much more heavily in supply chain H&S strategies to reach SME as and to respond to the increasing casualisation of working relationships in the EU.

- **Common approaches to health and safety services**

The new strategy needs to focus on the critical importance of businesses getting access to the professional advice and services they need to be able to manage H&S effectively. The protection of every worker, regardless of size of company needs to be underpinned by effective and appropriate services, whether these are employed in-house or procured externally.

### **3) ENHANCING ENFORCEMENT**

- **Co-operation and exchange of experience**

RoSPA welcomes suggestions for continued co-operation between labour inspectorates to assess approaches to enforcement including enforcement techniques, publicising enforcement action and innovative penalties. The Society also welcomes participation of SLIC within a new merged advisory committee structure proposed in the document. Adequate EU funding must be found for SLIC also to help it play a more effective role in international H&S developments (see below).

### **4) EMPOWERING INTERMEDIARIES**

- **New pan European insurance initiatives**

RoSPA is pleased that the document includes reference to the need to enhance the role of insurers. Special studies are needed, for example, to examine the H&S promotional and support role of insurers, especially with SMEs, for example, by providing support services, signposting and raising awareness of the ‘business case’ for H&S.

- **Using other intermediaries**

Research is needed to establish, compare and contrast the H&S roles of a variety of intermediaries that interface with SMEs, especially trade associations and business development and support bodies, with special emphasis on the ‘business case’ for better OS&H performance.

- **Non government H&S organisations**

The Bilbao Agency should be asked to establish stronger links between all non-government H&S bodies in the EU, including campaigning bodies and bodies representing H&S professionals. An EU wide directory would be useful.

## **5) PRIORITY ISSUES**

- **Focus on high risk sectors**

EU wide agreement is needed at the highest level about a number of persistently high risk and thus priority sectors, especially construction, agriculture, forestry, the health sector and food with EU wide programmes (including twinning) and targets establishing for each one.

- **Health and 24/7 safety**

RoSPA supports the broader focus on ‘well being’ in the document. There needs to be a creative approach to promoting health via the workplace, with a new emphasis on rehabilitation. Stress must be addressed as a safety as well as a health issue (stress impairs safe behaviour). Also, the EU needs to embrace and promote not only health education via the workplace but the much wider and more diverse range of initiatives that can be developed by employers to promote ‘24/7 safety’, including home safety and safety initiatives in local communities.

- **Tackling work related road safety EU wide**

Integrating the management of occupational road risk within occupational health and safety management will be a test of the credibility of the new approach, particularly as regards ‘mainstreaming’ H&S and linking it with other policies, in this case transport. Nearly 50,000 people are dying across the EU annually () as a result of road accidents. Between a quarter and a third of these (13, 000 to 17,000) are likely to be work related. This compares with some 4,500 in all other occupational accidents. While precise research evidence is still needed it is safe to assume that over twice as many workers are killed on Europe’s roads while at work than in accidents in fixed workplaces. WoRRI is thus by far the biggest safety risk faced by millions of workers in the EU, including not only vocational drivers but those who cannot do their work without driving. Millions of members of the public are injured in accidents involving vehicles being used for work purposes. On its own road traffic law in MSs does not adequately address the problem. Employers have duties to assess and manage these risks and thus a clearer EU focus on this important aspect of worker safety could not only help to make working life safer for employees throughout Europe, it could also help to improve road safety for the general public. Thousands of progressive organisations throughout the EU are now integrating action in this area

into their mainstream health and safety management. Further, as workers become increasingly mobile in a service based economy, the EU needs to be able to respond to this vitally important dimension of health and safety in the rapidly changing world of work (see <http://www.rosipa.com/morr/information/18arguments.htm> ).

## **6) EDUCATION AND RESEARCH**

- **Schools education**

RoSPA agrees that a major programme is required to encourage integration of safety and risk concepts in schools education across Europe. As part of this common approaches need to be developed to safety and risk literacy across the EU.

- **Safe learner framework**

RoSPA would also like to see a common EU framework for the health and safety of trainees so that all learners, including those entering the world of work for the first time, received basic H&S information, training and supervision. Consideration might be given to the idea of a European H&S passport.

- **Professional and business education**

A similar programme is required to ensure effective EU wide coverage of H&S in courses for safety significant professionals and in all business education curricula.

- **University based teaching and research**

A strategic review of teaching and research is required at Member State and EU level, leading to enhanced co-operation, including via web-based learning. The review also needs to link with an EU strategy for co-ordinating identification of unmet OS&H research needs.

## **7) INTERNATIONAL H&S DEVELOPMENT**

- **Embedding H&S in international development work**

If the EU is not to be disadvantaged by unfair competition due to lower employment and social costs (including the costs of effective regulation of H&S) it is vital that the EU plays a very strong role in helping to raise standards of H&S protection for workers outside the EU too, wherever possible embedding health and safety management in international development efforts. Health and safety must be advanced as a ‘cornerstone of a civilised Society’ (which is the opening part of UK Health and Safety Commission’s new ‘vision’), something which arguably has very much greater relevance in developing countries, particularly since at a global level more people die annually from work related accidents and diseases than are killed in wars! Thinking along ‘mainstreaming’ lines, this means that the EU must ensure that health and safety risk management is a prominent feature of all EU sponsored overseas development projects. There needs to be a highly vigorous policy of promoting higher H&S standards outside the EU, involving wherever possible European trans-national companies.

## **8) GENERAL ISSUES**

- **Strengthening networks**

RoSPA favours strengthening the role of the Bilbao Agency and its focal points and topic centres, with maximum use of learning networks across the EU, including face-to-face exchanges of ideas and experiences (see above) and high quality video conferencing to facilitate

twinning without travel. (see 'Meeting without Moving' at <http://www.meetingwithoutmoving.com/>).

### **Conclusion**

The Committee's views are sought on the above ideas. RoSPA will be feeding these into the ongoing debate, including via its participation in a major conference being organised by HSE on future EU H&S strategy on 18<sup>th</sup> October in Liverpool.

**Roger Bibbings**

**Occupational Safety Adviser**

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