



# **Fostering occupational safety and health culture in small businesses**

## **Enabling businesses to create, maintain and live by good OSH culture**

### **A guide for labour inspectors**

*Committee of Senior Labour Inspectors (SLIC)  
SLIC WG Enforcement  
Sub-group Fostering OSH Culture in SMEs*

*Adopted at the 69<sup>th</sup> SLIC Plenary in Luxembourg, 13 November 2015*

## A. Preface.

Fostering a culture of occupational safety and health is an important challenge for authorities supervising working conditions throughout Europe. Small businesses, as opposed to large, in which there are organized systems of occupational safety and health management, may need support to develop and strengthen their health and safety culture. Promoting a culture of safety and health was one of the priority tasks of the Senior Labour Inspectors Committee in 2013-2015, and as part of this task SLIC Working Group Enforcement has prepared this guide for labour inspectors.

This guide has been prepared by a sub-group comprising representatives of labour inspectorates from Cyprus, Denmark, Ireland, Norway, Poland, Sweden and United Kingdom. It is aimed at labour inspectors, as a toolkit to help them:

- diagnose OSH culture deficiencies during inspection;
- address the issues identified around developing OSH culture;
- understand and explain the role of OSH management in a business, especially employer's and manager's leadership, commitment and employees' participation;
- prepare for inspection that will focus on OSH culture;
- to assist employers in developing a better OSH culture during and after inspection.

Information included in the guide was drawn from:

- sub-group members' ideas and experience;
- replies from 23 Member States to the questionnaire disseminated among SLIC WG Enforcement members in 2014;
- *Management Leadership in Occupational Safety and Health. A practical guide* (European Agency for Safety and Health at Work, Luxembourg 2012, Publications Office of the European Union);
- *Managing for Health and Safety* (Health and Safety Executive, UK, 2013).

Most Member States agree with the definition accepted in the Bilbao Agency campaign 2012-2013 *Healthy workplaces. Working together for risk prevention* of OSH culture: 'cooperation of employer's and manager's leadership and worker's participation'. This guide underlines the role of cooperation between employer and employees in developing successful OSH culture, and recognises that OSH culture needs to be embedded within the wider organizational culture.

The guide has an open structure to allow Member States to add further practical information on the national level before disseminating the guidance among labour inspectors.

The guide's users should remember that developing OSH culture needs time and results may not be seen immediately. The document has been prepared to allow flexibility in the conduct of inspections, so that they do not take too much time. We hope that this guide will help labour inspectors to promote and help businesses achieve an effective OSH culture.

## B. What is an occupational safety and health culture?

One of the central pillars of a Health & Safety Management System within an organisation should be the creation and promotion of a strong OSH culture, with the right to a safe and healthy working environment for all. Leaders and managers through their words, actions and responses have a major influence on the way employees see the reality within an organisation and therefore have a significant responsibility in creating a strong OSH culture.

Culture exists simultaneously on three levels within an organisation. The three levels identified by Schein are an organisation's artefacts, values and assumptions (Schein, E. H., 1985, *Organisational culture and leadership*, San Francisco: Jossey-Bass).

### Levels of culture from an OSH perspective

Levels of Culture	Description/OSH Examples
<b>Artefacts</b>	The organisation's visible structures and processes regarding health and safety. Examples: posters, audit reports, messages and slogans, work procedures, instructions, training.
<b>Values</b>	The organisation's strategies, goals and philosophies regarding health and safety. Example: policy statement, procedures, workers' attitudes and behaviours in respect of themselves and fellow workers (management/co-workers).
<b>Assumptions</b>	The organisation's unconscious and embedded beliefs, perceptions, thoughts and feelings about health and safety. Although invisible, examples might include knowledge and acceptance of standards of risk control, how much time is spent on risk management, acceptability of challenging/correcting people's behaviours.

### **Organisational culture.**

Organisational culture influences the attitudes, motivation and behaviours of managers, supervisors and workers within the workplace. An organisation's work procedures and processes can have a positive or negative influence on the management of OSH, this influence can in some cases make OSH culture a sub-culture within the organisational culture.

### **Definition of a safety culture.**

National Institute of Occupational Safety and Health (NIOSH, NORA, Construction Sector Council, US, 2008) define culture as:

*Safety Culture reflects the attitudes, values, and priorities of management and employees and their impact on the development, implementation, performance, oversight and enforcement of safety and health in the workplace.*

### **Development of an OSH culture.**

The development of a strong workplace OSH culture requires the commitment from the management team who must communicate and demonstrate their commitment on a daily basis. The commitment of the managers should be demonstrated through their actions, words and provision of resources. The management of health and

safety in the workplace is the priority and responsibility of both management and employees, working in partnership.

**Characteristics of a strong OSH culture.**

In an organisation where there is a strong OSH culture, the managers and employees will share the responsibility for ensuring that the workplace is safe and without risks to health. An environment will exist in the workplace where unacceptable risks will be identified and corrected immediately and inappropriate behaviours will be challenged and addressed. The management and employees will be working together, using a model of participation and consultation for the purposes of motivating and supporting a strong OSH culture.

The tables presented below, were prepared on the basis of the publication issued by the Health and Safety Executive, titled **Managing for Health and Safety** (Health and Safety Executive, UK, 2013), and case studies gathered in replies to the questionnaire sent by 23 Member States.

What it looks like when done effectively	What it looks like when done badly or not at all
<b>LEADERS</b>	
<ul style="list-style-type: none"> <li>→ Maintain attention on the significant risks and implementation of adequate controls.</li> <li>→ Demonstrate their commitment by their actions; they are aware of the key health and safety issues. Their involvement must be visible and genuine.</li> <li>→ Ensure consultation with the workforce on health and safety. Leaders take the time to talk to the workers on OSH matters enabling their engagement.</li> <li>→ Adoption of an open door policy on OSH issues.</li> <li>→ Investigation of all accidents and near misses.</li> <li>→ Challenge unsafe behaviour in a timely way.</li> </ul>	<ul style="list-style-type: none"> <li>→ Set no health and safety priorities.</li> <li>→ Don't understand the need to maintain oversight.</li> <li>→ Don't meet their own organisation's standards/procedures, e. g. wearing appropriate PPE on site/shop floor.</li> <li>→ Lack of engagement with health and safety by workers.</li> <li>→ Health and safety is seen as an add-on, irrelevance or nuisance.</li> <li>→ Poor incident history (accidents, near misses, plant damage or other indicators, e.g. poor maintenance, poor housekeeping).</li> </ul>
<b>MANAGEMENT FOR HEALTH AND SAFETY</b>	
<ul style="list-style-type: none"> <li>→ A systematic approach is used to manage health and safety.</li> <li>→ People understand the risks and control measures associated with their work.</li> <li>→ Contractors adhere to the same standards.</li> <li>→ Appropriate documentation is available: current, organised, relevant.</li> </ul>	<ul style="list-style-type: none"> <li>→ Incomplete or missing paperwork. Does not link to actual risks in the workplace.</li> <li>→ Confusion over roles, inaction as no one takes responsibility for health and safety, distrust of management motives.</li> <li>→ Widespread, routine violations of procedures. No oversight of contractors.</li> <li>→ Information is not passed on, not</li> </ul>

<ul style="list-style-type: none"> <li>→ People understand their roles and those of others.</li> <li>→ Performance is measured – to check controls are working and standards are being implemented, and to learn from mistakes after things go wrong.</li> <li>→ Safe behaviour is recognized and rewarded.</li> <li>→ Health and safety is integrated into business processes.</li> <li>→ Existence of a suitable and appropriate written risk assessment (participation from employees and specialist).</li> <li>→ Review of Safety Management System when necessary, at least annually.</li> <li>→ Inspection and certification of work equipment.</li> <li>→ Benchmarking is used to compare performance with others.</li> <li>→ Supply chains are influenced to improve health and safety.</li> </ul>	<ul style="list-style-type: none"> <li>understood, or not implemented.</li> <li>→ Managers are unaware of employee concerns or do not respond appropriately.</li> <li>→ Lessons are never learned.</li> </ul>
<p>Additional factors important for small and micro businesses:</p> <ul style="list-style-type: none"> <li>→ The behaviours and attributes of a very small group, or perhaps one person such as the business owner, are critical.</li> <li>→ What the owner does to set an example and to provide a lead on health and safety to their staff determines the outcome.</li> </ul>	
<p><b>COMPETENCE</b></p>	
<ul style="list-style-type: none"> <li>→ All know the risks created by the business and understand how to manage them.</li> <li>→ Key responsible people/job holders are identified and there are clearly established roles and responsibilities.</li> <li>→ Clearly defined roles for OSH tasks within the business.</li> <li>→ People have the necessary training, skills, knowledge and experience to fulfil their responsibilities and are given enough time to do so.</li> <li>→ Training takes place during normal working hours and employees are not charged.</li> <li>→ Lessons learned and good practice are shared internally and externally.</li> </ul>	<ul style="list-style-type: none"> <li>→ Lack of awareness of key hazards/risks.</li> <li>→ People lack the skills, knowledge and experience to do their job.</li> <li>→ Health and safety advice and training are irrelevant, incompetent or wrong.</li> <li>→ No standards set; people not held accountable.</li> <li>→ Insufficient action is taken to comply with the law.</li> <li>→ Knee-jerk reactions follow incidents/near misses.</li> <li>→ The organisation does not know what it needs to do to move forward.</li> </ul>
<p>Additional factors important for small and micro businesses:</p> <ul style="list-style-type: none"> <li>→ In small businesses the responsibility of providing competent advice often rests with the owner/manager.</li> <li>→ The owners need assistance that will help them ask the right questions if they are looking for competent advice.</li> </ul>	

<b>WORKER CONSULTATION AND INVOLVEMENT</b>	
<p>→ Instruction, information and training are provided to enable employees to work in a safe and healthy manner.</p> <p>→ Safety representatives and representatives of employee safety carry out their full range of functions.</p> <p>→ The workforce are consulted (either directly or through their representatives) in good time on issues relating to their health and safety and the results of risk assessments.</p> <p>→ Easy access for employees to all OSH documentation.</p> <p>→ Feedback mechanisms exist for health and safety matters, such as:</p> <ul style="list-style-type: none"> <li>- 'suggestions boxes' or more formal open meetings with management;</li> <li>- team meetings are held and may be led by employees.</li> </ul> <p>→ Joint decisions on health and safety are made between managers and workers.</p>	<p>→ Employees lack the right level of information, instruction and training needed to do their job in a safe and healthy manner.</p> <p>→ Representatives cannot carry out their functions.</p> <p>→ Employees don't know who they would go to if they had health and safety concerns.</p> <p>→ Health and safety controls don't seem practical or employees are having to work around difficulties.</p> <p>→ Managers don't discuss how to use new equipment safely or how to do a job safely.</p> <p>→ There is little or no evidence of information on OSH being spread among employees.</p>
<p>Additional factors important for small and micro businesses:</p> <p>→ Smaller businesses tend to have simpler, less formal systems in place such as face-to-face discussion, toolbox talks, or periodic meetings on specific issues.</p> <p>→ Owner's arrangements concerning OSH issues should allow employees to have a say.</p>	

**Summary.**

The critical factors that are required for the creation of a strong safety culture within an organisation include:

- commitment from senior management;
- involvement of all individuals through consultation and participation;
- clear communication of the standards and behaviours expected;
- collective responsibility of all to provide a safe and healthy workplace.

The creation of a strong safety culture will be beneficial to both the organisation and individuals who work in the organisation. Where a strong safety culture is present everyone's right to a safe and healthy workplace will be respected and provided.

## C. What are the benefits of a successful OSH culture?

Good practice case studies in Member States, demonstrating the benefits of a successful OSH culture in micro, small and medium enterprises, were collected and analysed aiming to help labour inspectors to present benefits of a successful OSH culture to inspected businesses. A summary of actions taken within a business indicating the benefits of OSH culture obtained are summarized below:

- Elimination, reduction and improved control of health and safety risks.
- Reduction of accidents, dangerous occurrences (e.g. fires) and mental health problems.
- Reduction of sick leave days.
- Reduction of production costs / increased productivity.
- Workers feel a sense of “ownership” over the measures taken that lead to increased work satisfaction and motivation.
- More pleasant working environment.
- Improvement of workers integration in the company.
- Recognised social and entrepreneurial prestige.
- The image of the company makes it easier to recruit personnel and secure new orders.
- Trained and motivated employees / managers.
- Improved work organisation enabling work times to be reduced and the quality of work to be improved.

**NOTE:** Case studies on the national level (illustrating successful OSH culture in small and micro businesses) could be gathered and included in this guide by Member States here before disseminating the guide to labour inspectors.

## D. Which businesses should labour inspectors prioritise to support an OSH culture?

Our goal is to encourage all businesses to strive towards and achieve an effective health and safety culture. Where such a culture exists, the organisation will be self-regulating, proactively managing its risks, achieving sustained compliance and wider benefits for the business and the worker such as improved productivity and well-being. Labour inspectors can play an important role in facilitating and enabling the development of this culture and once established there should be little need for further labour inspectorate intervention.

However, there are a number of factors that labour inspectors will want to take into account when planning their interventions, summarised as follows:

- **Labour inspectorate strategy and intervention policy.** Supporting businesses to develop their culture goes beyond just establishing compliance with regulation, and does take more time. Labour inspectors will need to align their intervention with their own national labour inspectorate procedures and priorities.
- **Business risk profile.** Businesses with higher risk profiles will benefit most from achieving an effective health and safety culture by sustainably reducing injury and ill health and the potential for harm. Many labour inspectorates have existing arrangements to prioritise interventions to sectors with higher accident and ill health incidence rates and those businesses where risk management is known to be weak. Where there are few risks to be managed, or risks are being managed well, the labour inspectors' time will be more effectively spent with another business.
- **The maturity of the organisation.** New businesses can build a strong culture more easily if they do so from the outset rather than having to change an embedded culture. The labour inspector's involvement at an early stage can be helpful.
- **Amenability to advice and change.** Businesses that have recently experienced injury or ill health amongst their workforce can be more willing to recognise the need for improvement and to engage with the labour inspector. Businesses that are not convinced of the benefits of developing a better culture, or those that are just about compliant and don't recognise that there is scope for improvement, are unlikely to participate.
- **Discretion.** Labour inspectors will wish to use their judgement on how much progress a business might be able to make in developing a health and safety culture, and consequently how much support or how long to provide it.

## E. How should I prepare for an inspection?

This guide has so far focused on what occupational safety and health culture is, its characteristics, the benefits of successful OSH culture and which businesses to prioritise for a culture-focused approach. Below you will find information on how to prepare for an effective inspection.

Action	Content
<b>Clarify the purpose</b>	Clarify the goals, themes and expected time needed for the inspection.
<b>Clarify the nature of the business, its risk profile and performance history</b>	In accordance with national procedures, labour inspectors should gather as much information as possible about the business before the inspection – what risks workers are likely to be exposed to in the sector and any information on past performance such as inspection reports, enforcement, accident reports and any information from other authorities.
<b>Clarify inspection method</b>	<p>To explore culture the inspection needs to go beyond considering mere compliance by simple observation of physical standards and examination of documentation. It is often necessary to talk with a range of people, from workers to supervisors and managers to the boss, to find out how and why they do as they do, and what normally happens when the inspector is not on the site. As tools for this the inspector can choose between a variety of methods:</p> <ul style="list-style-type: none"> <li>– planned interviews with key personnel;</li> <li>– group interviews;</li> <li>– dialog with different groups so that statements can be held against each other for comparison. i.e. company owner, manager, supervisor, employees, employee representatives;</li> <li>– site inspection, observation and examination of documentation;</li> <li>– a pre-meeting with the business.</li> </ul> <p>The objective in choosing the method for inspection is that the inspector really needs to understand if both employer and employee’s share the same OSH values, that they have the same understanding and live by the same OSH culture. To support this it can be useful to have some questions and examples prepared before the visit. e.g.</p> <ul style="list-style-type: none"> <li>• What health and safety hazards are you aware of?</li> <li>• What risks are you exposed to?</li> <li>• How are they controlled?</li> <li>• How do you know about these risks and controls?</li> <li>• Were you involved in identifying and agreeing preventive measures / controls?</li> <li>• Does your supervisor/manager ask you about your work and any concerns?</li> <li>• How would/can you report concerns?</li> <li>• If you have done so, did anything happen as a result?</li> <li>• Do you report near misses?</li> <li>• Can you stop dangerous work?</li> <li>• Have you ever seen the boss on the factory floor?</li> <li>• Does he/she wear PPE?</li> <li>• Does anyone check safety measures or PPE are used and</li> </ul>

	maintained?
<b>Clarify roles of the resources</b>	If the planning of the scope and the goals of the inspection has established the need for more than one inspector, the inspectors need to agree on roles and responsibilities. A similar coordination is necessary when the scope and the goals of the inspection require inspectors from other authorities.
<b>Prepare promotion of good OSH culture</b>	Where the inspection reveals deficiencies in culture or room for improvement, labour inspectors should find the last chapters of this guide useful. See especially the chapter on what to do after inspection, and the chapter on where to learn more about OSH culture.
<b>Notification</b>	As described in the section 'Clarify inspection method' above we expect to talk to a range of people, including busy managers, and so it may be necessary to notify the inspection. The need for notification will often be determined by the nature of the business. In these cases it is good practice to explain what the labour inspector intends to do, who they expect to spend time with and to provide links to any relevant information. However, the intervention should be in accordance with labour inspectorate's policy and procedure on whether to notify or not. If the business is to be notified it will be transparent and expedient if they are told: <ul style="list-style-type: none"> <li>- Time and place of the inspection.</li> <li>- Scope and theme of the inspection.</li> <li>- Information on which personnel the inspector wants to meet.</li> <li>- Who will participate from the labour inspectorate and any other authority</li> <li>- Documentation that must be at the premises, or the need for information to be sent to the authority before the inspection.</li> <li>- That it is expected that the employer prepares for the inspection together with the worker's representative(s).</li> </ul>
<b>Prepare for challenges</b>	The inspector should be able to complete a normal compliance-based physical inspection. It may be that the business is not willing to embrace a cultural change, and the inspector must be prepared to accept that. It is therefore useful to prepare for the following possible scenarios at the inspection: <ul style="list-style-type: none"> <li>- Selected businesses don't want to participate.</li> <li>- Employer disagrees to the participation of selected participants.</li> <li>- Employer wants to participate in group interviews with employees.</li> <li>- Participants do not show up.</li> <li>- The business wants to discuss other themes than what is the actual theme of the inspection.</li> <li>- One or more participants do not understand the concepts and language.</li> <li>- The manager is not there (crucial to inspecting OSH culture).</li> <li>- How to address newly established or well established business differently?</li> <li>- Are there particular characteristics for the specific business that need / require for specific approaches?</li> <li>- Do they have the ability to engage in work on OSH culture?</li> </ul> Promoting a change in culture takes time; the same is valid when

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	implementing OSH culture. Changes will not happen in the business over-night so they may not see what is in it for them.
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**The main goal:**

**INSPECTION WELL PLANNED AND THE INSPECTOR WELL PREPARED.**

## F. How should I inspect to foster OSH culture?

### 1. Inspection approach.

Arriving at a work place with the ambition of fostering OSH culture there are a number of things you have to do as an inspector. Some may be in addition to your normal inspection procedure:

- Talk to a range of people in the business, including the proprietor/director, managers/supervisors and to some workers and their representative(s). Discuss other non-observed risks and their controls to test knowledge and understanding.
- Observe the actual work environment, and how a relevant sample of risks are being controlled, study some safety documents, if necessary to support other evidence.
- Form your conclusions.
- Decide whether formal enforcement or advice is appropriate.
- Communicate your findings with the owner/ managers and the workers.

#### 1.1. Talking with a range of people in the business.

Persons that labour inspectors should talk with and what about:

Person that inspector should talk with	What about?	Why is it important for successful OSH culture?
<b>I. The proprietor or someone representing top level management and managers/supervisors.</b>	Is OHS important for them? How is it communicated?	How do they ensure participation? The management must "walk the talk". It's not what they say that is important, but what they do! E.g. workshop visits, speaking with workers about OSH, wearing PPE in the factory.
	What procedures exist for OHS activities?	The bigger and more complex a company is, the more there is a need for a systematic approach to OSH.
	What top OHS risks have they identified (risk assessment)?	If they leave half the risks out it is a sign that they do not have sufficient knowledge or that they do not care.
	How do they ensure that every employee has sufficient knowledge and understanding about relevant OSH?	E.g. workshop visits, speaking with workers about OSH, wearing PPE.
	How do they ensure participation?	A good collaboration with the workers results in involvement and ownership of effective risk controls.

<b>II. Safety officers or other representatives for the employees.</b>	Does the management inform about OHS risks and how work should be carried out in a safe way?	Do the workers get enough training when it comes to OSH? In a workplace with good OHS culture, the management never accepts that PPE is not being used, and lack of time is never an excuse not to work in a safe way.
	Do they have enough time to work with OSH?	It is a binding rule. But what is the management's ambition?
	Are they involved in carrying out OHS activities?	There is a lot of knowledge in the organization about OHS risks but also about solutions and it is important to use this knowledge in order to get full effect in the OHS work.
	Do the workers get enough training when it comes to OSH?	Knowledge of risks is needed to avoid them. But what is the management's ambition?
<b>III. Workers.</b>	Are they encouraged by management to take the time necessary to work in a safe way and to use control measures? For example, is it okay not to use PPE or take short cuts?	The management must use every opportunity to show the workers that they mean what they say!
	Does the management listen to suggestions in order to improve the work environment?	There may be a lot of knowledge in the organization about OHS risks and their control but it is important to use worker's knowledge to make sure controls are suitable and effective, and that the workers own them.
	Do they report incidents and accidents, and near misses?	An investigation should focus on the organizational prerequisites and not the actual worker reporting the issue. What happens as a result?
	Do they have confidence in the management when it comes to OSH?	The management must use every opportunity to show the workers that they mean what they say, and take OSH seriously.

	When new technology is installed, are the OSH measures preventive or reactive?	An OSH culture requires preventive actions.
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**1.2. Study the actual work environment.**

When you have talked to the above-mentioned persons you should do some observation of the actual work environment. Choose a number of (2 to 3) common risk factors within the company’s sector. For example risks concerning chemicals, machinery safety, noise or ergonomic issues. Talk to some workers and study how they behave when it comes to working in a safe manner, using PPE, following safety procedures, etc. With these ingredients as a basis, make your diagnosis of the OSH culture ‘on the floor’.

**1.3. Study some documents.**

If necessary, study any relevant documents (safety procedures, safety sheets, risk assessment, action plans, other legal documents) to verify observations and information from discussion.

**1.4. Form your conclusions.**

Now it is time to combine your knowledge of the company’s OSH culture into a general diagnosis.

- Is the steering from the top level management sufficient?
- Has the top level management’s intentions reached the workers?
- How big is the difference between the top management ambition and the situation on the floor?
- Are the OSH activities mostly preventive or reactive?
- Are there any severe risks that are not taken care of? If yes, what is the organisational cause of this (lack of knowledge, lack of resources, lack of interest)?

Perhaps it would be efficient to visualize the result:

LEVEL 1	LEVEL 2	LEVEL 3
A non-existent OSH culture	Some parts of a OSH culture exists but improvements are necessary	An existing OSH culture! Good luck!

**1.5 Decide whether some requirements or advice should be set out.**

What requirements or recommendations are there? For example:

- The management should communicate their ambitions to the workers more clearly – leadership (walk the talk!).
- The collaboration between management and safety officer/workers must be improved, e.g. in work planning and risk assessment.
- The OSH activities must focus on preventive, not reactive actions.

**1.6. Communicate your findings with the top management and the safety officer.**

Do it with a supportive and coaching approach. Try to show the relationship between the management’s level of commitment and the actual situation on the floor. Inform of the benefits the company would get with an improved OSH culture. Refer to suitable material, websites and occupational services.

**2. Non-inspection activities.**

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2.1. If there is a self- evaluation tool on the internet the labour inspectorate can send out letters to a certain number of companies recommending them to use it. The suggestion can be followed up at inspections in the future.

2.2. In connection with an "ordinary" inspection the inspector can inform the employer about OSH culture. What measures must be taken in order to instilling an OSH culture or to improve a weak one? Perhaps the inspector can hand over a brochure or recommend a suitable website?

2.3. An inspector can participate at a conference or workshop for SMEs and inform them about OSH culture.

## G. What tools do I have?

1. As a result of the EU-OSHA campaign 2012-2013 “Healthy workplaces. Working together for risk prevention” a special guide for employers was issued (in all EU languages): **Management Leadership in Occupational Safety and Health. A practical guide** (European Agency for Safety and Health at Work, Luxembourg 2012, Publications Office of the European Union). This publication contains a simple OSH leadership self-assessment tool which can also be useful for labour inspectors when conducting inspection focused on fostering OSH culture. The tool underlines four aspects of occupational health and safety approach:

- prevention policy,
- leadership,
- prevention tools,
- information, training and consultation.

	A	B	C	D
<b>PREVENTION POLICY</b>				
<b>Prevention policy targets</b>	No safety and health targets are set.	General safety and health targets are set.	Specific safety and health targets are set and reviewed now and then.	Specific safety and health indicators are measured and the policy is adapted accordingly to ensure continuous improvement.
<b>Policy statement</b>	There is no health and safety policy statement.	There is a general and vague health and safety policy statement.	A clear policy statement that expresses the company’s engagement is drafted.	A clear policy statement showing the company’s engagement is communicated to workers and clients.
<b>Action plans</b>	Measures in the field of safety and health are taken now and then (after accidents, an inspection visit, etc.).	Some actions in the field of safety and health are planned based on a global evaluation of the company’s activities.	A safety and health action plan (indicating timing, responsibilities and resources) based on a risk assessment is established.	A safety and health action plan (indicating timing, responsibilities and resources) based on an in-depth risk assessment is established and regularly reviewed and adapted.
<b>LEADRESHIP</b>				
<b>Leadership</b>	Nobody demonstrate	The company’s OSH expert	The management shows leadership	The management

	s leadership in prevention because it is assumed that all individuals know the importance of it by themselves.	demonstrates leadership in prevention. He/she embodies the policy by giving a good example.	in prevention. This is clearly mentioned in the policy statement.	leads by example and demonstrates leadership in prevention.
<b>Responsibility</b>	Nobody in the organisation has explicit safety and health responsibilities.	The responsibility for safety and health is delegated to the company's OSH expert.	The company's OSH expert together with line management is responsible for the safety and health policy.	The line management is responsible for bringing the safety and health policy into practice.
<b>Management</b>	Health and safety issues are almost never discussed during management and/or board meetings and they are not criteria for management performance evaluation.	Health and safety issues are only discussed during management and/or board meetings after serious accidents and in that case they are criteria for management performance evaluation.	Health and safety issues are a standard item on the agenda of management and/or board meetings and discussion takes place if necessary. They are part of the criteria for management performance evaluation.	Health and safety issues are a standard item on the agenda of management and/or board meetings, including follow-up and communication. They constitute major criteria for management performance evaluation.
<b>PREVENTION TOOLS</b>				
<b>Risk assessment</b>	It takes a serious accident to start assessing the risks associated with the companies' activities.	The company's OSH expert has an accurate picture of the risk profile of the organisation.	Managers have an accurate picture of the risk profile of the organisation.	All safety and health risks are assessed, documented and regularly evaluated and reviewed. All workers are informed and instructed accordingly.
<b>Workplace inspections</b>	No workplace inspections are carried out because there are	The company's OSH expert now and then performs workplace inspections to	The company's OSH expert regularly performs workplace inspections together with the	Workplace inspections are performed regularly by the management

	enough instructions and procedures to guarantee health and safety.	evaluate the health and safety situation on the shop floor.	line manager of that particular department/workplace.	and they take appropriate measures to tackle every non-conformity.
<b>Procurement (services, suppliers, products)</b>	Procurement takes into account several aspects such as price and efficiency. Health and safety criteria are not considered a specific aspect.	Procurement takes into account several aspects such as price and efficiency. Health and safety criteria are taken into consideration when procuring 'dangerous' machines.	When procuring equipment, goods and services, specific health and safety criteria are taken into consideration.	When procuring equipment, goods and services, specific health and safety criteria are used and verified upon reception and before putting into service.
<b>INFORMATION, TRAINING AND CONSULTATION</b>				
<b>Work introductions and instructions</b>	New workers (including temps and apprentices) are directly put to work. They receive information and instructions when there is time available.	New workers (including temps and apprentices) are put to work after receiving written job instructions.	Before new workers (including temps and apprentices) are put to work, they receive all necessary information and instructions.	Before new workers (including temps and apprentices) are put to work, they receive all necessary information and instructions and it is checked that they understood them.
<b>Training</b>	The staff and management don't receive safety and health training. They learn by experience.	Workers receive specific job-related health and safety training.	Workers and management receive specific job-related health and safety training.	Each person in the company, from workers to management, receives all necessary safety and health training with regular updates.
<b>Consultation</b>	The company's OSH expert lays out the	The management lays out the prevention	The management lays out the prevention policy after consultation	The management is engaged in an ongoing

	prevention policy and communicates it to the management.	policy. The result is communicated to the workers.	of the workers (representatives).	dialogue with the workers (representatives) on all OSH-related issues.
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Calculate the score by means of the scoreboard you find below:

Number of As		x 1	=	
Number of Bs		x 3	=	
Number of Cs		x 5	=	
Number of Ds		x 7	=	
<b>TOTAL:</b>				

**61 and more:** The OSH prevention policy in the company is situated **at a fairly high level**. Should be continued in this way.

**37-60:** The employer certainly takes care of prevention, but **improvement is possible** on several aspects.

**12-36:** Prevention in the company is **still in the cradle**. The employer should prepare himself / herself urgently to take more prevention measures.

2. The second tool, a checklist, was prepared on the basis of publication issued by Health and Safety Executive, titled **Managing for Health and Safety** (Health and Safety Executive, UK, 2013). This publication mentions three aspects that are crucial to develop successful OSH culture:

- leading and managing for health and safety,
- competence,
- worker consultation and involvement,

and defines questions concerning these aspects that could be useful for employer.

<b>LEADING AND MANAGING FOR HEALTH AND SAFETY</b>
→ Is there leadership from the top of your business? Is it visible? → What example do you set? Do you talk about health and safety? When did you last do this? → What are your significant risks and how do you know they are being controlled? → Are the health and safety implications of your business decisions recognised and addressed? → Is there evidence that the board or leader of your organisation is responsive to the health and safety information that is reported? → How is health and safety included in the processes or management arrangements you have for running the business? → How do you ensure access to competent advice? → How do you ensure health and safety information is communicated effectively within and beyond your business? → How do you control your contractors? → How do you review your health and safety performance?
<b>COMPETENCE</b>
→ Who fulfils the role of health and safety competent person? <ul style="list-style-type: none"> <li>- What are their background, training and qualifications?</li> <li>- What is their awareness of current health and safety law relating to key risks?</li> <li>- Are they allowed enough time to dedicate to health and safety?</li> </ul> → External provider of competent advice <ul style="list-style-type: none"> <li>- How were they selected?</li> </ul>

- What is their competence to provide advice to this particular business?
  - Do they allocate adequate resources and tailor advice to this particular business?
  - Do you check that the documentation provided, e.g. visit reports, is suitable, covers the key hazards, assesses the right risks and gives the right advice?
- Does the business act upon advice from the competent person?
- If there is an identified lack of competence in a particular area, what are you doing to deal with the problem?
- How are staff selected for the tasks carried out?
- Are arrangements in place to ensure staff are aware of roles and responsibilities?
- Have you identified the training they need?
- Ensure relevant and sufficient training is delivered. Look for use of training schedules, operating manuals, sampling delivery of training, training for trainers etc.
  - Check the necessary level of competence has been reached.
  - Check that training is applied.
  - Provide update/refresher training.
  - Ensure training records are kept.
- Have you provided enough competent cover for absences?

#### **WORKER CONSULTATION AND INVOLVEMENT**

- How are employees or their representatives consulted and involved in health and safety matters?
- How effective are those mechanisms in relation to the business' size and structure, or the rate of workplace change?
- Are employees consulted in good time?
- Do health and safety representatives have sufficient time and access to the facilities they need to carry out their functions?
- Do contractors have an appropriate level of induction and training?

**NOTE:** Another OSH culture assessment tool on the national level can be included in the document by Member States before disseminating the guidance among labour inspectors.

## H. What can I do after inspection?

### 1. Activities after inspection.

At the end of an inspection labour inspectors have different ways of taking action in order to ensure that the business complies with the OSH laws. Most labour inspectors have the possibility to serve improvement notices and/or give guidance to the business.

Other possible actions:

- agree an action plan with the business;
- check progress and ensure action has been taken by a **follow-up inspection**;
- give **instruction and guidance** to the business by writing, telephone calls or through follow-up inspections.

### 2. Information.

A prerequisite for fostering OSH culture in small and micro-businesses is knowledge about OSH in both employers and employees. Labour inspectors can:

- give information to the employer and the employees about relevant **guidance**;
- provide information about relevant **web pages**;
- give advice about **special designed toolkits**, which are relevant for the business;
- **provide information on relevant training**.

All actions and information provided by labour inspector must be related to issues identified during inspection as obstacles in creating successful OSH culture. It is very important that inspector shouldn't overload employer with information issued as a result of inspection.

## I. Where can I learn more about OSH culture?

Information on publications relating to OSH culture accessible in English, issued by EU-OSHA on the basis of experience gathered in all Member States:

- **Occupational Safety and Health culture assessment - A review of main approaches and selected tools (2011)**

Occupational safety and health culture, or more briefly 'OSH culture', can be seen as a concept for exploring how informal organisational aspects influence OSH in a positive or negative way. The aim is to convey up-to-date information on this complex topic in a straightforward, condensed way, trying to build a bridge between research and practice. The main approaches and methods that exist to assess the safety culture in an organisation are presented and discussed. This review gives an overview and selection of useful tools and techniques from the EU domain and abroad.

[https://osha.europa.eu/en/publications/reports/culture\\_assessment\\_soar\\_TWE11005ENN/view](https://osha.europa.eu/en/publications/reports/culture_assessment_soar_TWE11005ENN/view)

- **Worker participation practices: a review of EU-OSHA case studies (2012)**

EU-OSHA publishes case studies of good practices to prevent workplace risks. The cases are analysed and effective worker participation consistently appears as a basic requirement for the successful identification of problems and implementation of practical solutions, regardless of the size or type of workplace or type of problem. Many of the cases describe how worker participation took place in practice and its role in introducing successful prevention measures. This report compiles these worker participation components to provide an overview of how worker participation featured in the various cases and show the approaches and methods that were used.

[https://osha.europa.eu/en/publications/literature\\_reviews/worker-participation-practices-a-review-of-eu-osha-case-studies/view](https://osha.europa.eu/en/publications/literature_reviews/worker-participation-practices-a-review-of-eu-osha-case-studies/view)

- **Leadership and Occupational Safety and Health (OSH): An Expert analysis (2012)**

This report examines how good leadership practices can promote better occupational safety and health (OSH) behaviour amongst employees. It considers what are the necessary corporate leadership factors on which success depends. It does so by reviewing existing literature on OSH leadership. It also examines 16 detailed case studies from companies across the EU highlighting good practice, the type of activities that deliver achievements, innovative approaches, success factors and the role of stakeholders. In this report recommendations for improving OSH leadership are also made and explored.

[https://osha.europa.eu/en/publications/literature\\_reviews/leadership-and-occupational-safety-and-health-osh-an-expert-analysis/view](https://osha.europa.eu/en/publications/literature_reviews/leadership-and-occupational-safety-and-health-osh-an-expert-analysis/view)

- **Promoting occupational safety and health through the supply chain (2012)**

This report sheds light on occupational safety and health (OSH) within complex supply chain networks. Based on a literature, policy and case study review it attempts to give an overview of how OSH can be managed and promoted through the supply chain, and which drivers, incentives and instruments exist for companies to encourage good OSH practices among their suppliers and contractors.

[https://osha.europa.eu/en/publications/literature\\_reviews/promoting-occupational-safety-and-health-through-the-supply-chain/view](https://osha.europa.eu/en/publications/literature_reviews/promoting-occupational-safety-and-health-through-the-supply-chain/view)

- **Diverse cultures at work: ensuring safety and health through leadership and participation (2013)**

The differences between cultures are helpful in understanding discrepancies when several nationalities are working together. Cross-cultural studies describe characteristics of cultures and differences between different cultures. Therefore, the cross-cultural literature is very helpful in describing general differences that may occur in multinationals, as well as in multicultural teams. In this report the focus is on managing cultural diversity in occupational safety and health, i.e. aspects of leadership and participation that benefit multicultural work teams.

<https://osha.europa.eu/en/publications/reports/diverse-cultures-at-work-ensuring-safety-and-health-through-leadership-and-participation/view>

– **European Good Practice Awards 2012–2013 (2013)**

As part of the 2012–13 Healthy Workplaces Campaign on Working together for risk prevention, the European Agency for Safety and Health at Work (EU-OSHA) organised the European Good Practice Awards Competition. The 11th such competition, the 2013 awards aimed to identify examples of good practice in achieving risk prevention through cooperation between workers and managers. The awards recognise organisations that have made outstanding and innovative contributions to risk prevention.

<https://osha.europa.eu/en/publications/reports/european-good-practice-awards-2012-2013/view>

– **Management Leadership in Occupational Safety and Health – a practical guide (2012 – all EU languages)**

Includes self-assessment for leadership in OSH

[https://osha.europa.eu/en/publications/reports/management-leadership-in-OSH\\_guide/view](https://osha.europa.eu/en/publications/reports/management-leadership-in-OSH_guide/view)

– **Worker participation in Occupational Safety and Health – a practical guide (2012 – all EU languages)**

Includes checklists for worker participation

[https://osha.europa.eu/en/publications/reports/workers-participation-in-OSH\\_guide/view](https://osha.europa.eu/en/publications/reports/workers-participation-in-OSH_guide/view)

**NOTE:** Publications concerning OSH culture in micro and small businesses (e.g. publications describing methods of implementing OSH culture into employer's activity, tools for assessment of OSH culture in businesses) accessible in national language / languages should be included into the document by Member States before disseminating the guidance among labour inspectors. Especially publications accessible via Internet should be placed on the list.