European Agency for Safety and Health at Work

The view from the workplace: Safety and Health in Micro and Small Enterprises in the EU

European Risk Observatory

National Report: Italy

European Agency for Safety and Health at Work

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Authors:

Enrico Cagno and Guido J.L. Micheli

Politecnico di Milano, Department of Management, Economics and Industrial Engineering

Project management: Malgorzata Milczarek, Marine Cavet, Maurizio Curtarelli, EU-OSHA.

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1 Description of the national context

This section presents the main features of the Italian national context that are relevant for understanding the content of the present report.

1.1 National OSH infrastructure and regulatory context

1.1.1 Main actors and institutions

The Italian occupational safety and health (OSH) authorities that have executive power are the Ministry of Labour and Social Policies and the Ministry of Health at national level, and the Regions and Autonomous Provinces of Trento and Bolzano.

Other bodies involved are the Ministry of the Interior, INAIL (Istituto Nazionale per l'Assicurazione contro gli Infortuni sul Lavoro, Italian Workers' Compensation Authority, active in the field of safety and health in the workplace since 1994), and the CCIAA (Camere di Commercio, Industria, Artigianato e Agricoltura, Chambers of Commerce, Industry, Crafts and Agriculture, active in the field of safety and health in the workplace since 2004). CNEL (Consiglio Nazionale per l'Economia e il Lavoro, National Council for Economy and Labour) also contributes through its advisory activities and draws up considerations at the request of Parliament, the Government and the Regions; prepares observations and proposals on the legislation in progress, on — among other things — the main issues of economic policy and labour and social policies; and prepares periodic reports, studies and surveys on the issues of the economic situation and the labour market. Contributions and support in developing considerations and proposals on OSH topics also come from joint committees and sectoral bodies and institutions.

The Ministry of the Interior, in line with the provisions of the Legislative Decree of 9 April 2008, No 81, and subsequent amendments, better known as 'Testo Unico di salute e sicurezza sul lavoro' ('Consolidated Act on Occupational Health and Safety'), intends to build and spread a culture of safety and prevention, giving ample space to all of the activities and initiatives that contribute to fostering responsible behaviours among workers, oriented to protect not only their own safety but also the safety of others. The ministry also aims to identify strategies that contribute to effectively combating the phenomenon of accidents at work.

The CCIAA comprises public bodies that perform functions of general interest to the business system, taking care of its development within local economies. They support businesses, in particular small and medium-sized enterprises (SMEs) and micro and small enterprises (MSEs). Moreover, they provide information necessary for businesses to better understand the socio-economic reality — with particular reference to safety and health at work — with studies and analyses of data on the local territory. They are autonomous bodies with their own statute and political programme, and are financially and managerially independent. More recently, in the CCIAA, 'Corporate Social Responsibility — Social Commitment (CSR-SC)' helpdesks have provided assistance to companies that want to adopt socially responsible behaviours. The CSR-SC helpdesks have the goal of contributing to raising awareness of the themes of social responsibility among economic stakeholders, both social and institutional, with the aim of creating a regionally favourable environment for the adoption, by enterprises, of responsible and sustainable behaviours, including in the field of safety and health at work.

INAIL aims to reduce work-related risks and performs information distribution, training and assistance activities in the field of safety and health at work. To help reduce the number of workplace accidents and to grow a real culture of safety nationwide, INAIL develops and promotes the constant evolution of an integrated system for the protection of the worker and business support, which is efficiently and innovatively able to offer targeted instruments that are accessible to all.

1.1.2 Regulatory context — OSH specific

European directives led to a new concept of safety and health at work, one that was less coercive and more preventive in nature. Such a change was expressed in the incorporation of the provisions of the directives into national legislation. The relevant national legislation is composed of Legislative Decree No 626 of 19 September 1994 and current Legislative Decree No 81 of 9 April 2008, updated with the

provisions introduced by Legislative Decree No 106 of 3 August 2009, which coordinates and restructures all relevant legal provisions in a single regulation text.
Legislative Decree No 626/1994, which was in force until the first months of 2008, incorporated a number of EU directives related to safety and health at work into national law, including the Framework Directive, Directive 89/391/EEC, which sets down general principles. The decree evolved with the introduction of implementations of specific directives related to different risks/hazards in the workplace, which have been modified over time, as shown in the list below:

- the Framework Directive, 89/391/EEC (general principles);
- the Workplace Directive, 89/654/EEC;
- Directive 89/655/EEC on the use of work equipment, as modified by Directive 95/63/EEC;
- Directive 89/656/EEC on the use of personal protective equipment;
- Directive 90/269/EEC on the manual handling of loads
- Directive 90/270/EEC on display screen equipment;
- the Carcinogens Directive, 90/394/EEC, as modified by Directives 97/42/EC and 99/38/EC extending the first with the inclusion of mutagens;
- Directive 90/679/CE on the use of biological substances, as modified by Directive 93/88/EC;
- Directive 98/24/EC on the use of chemicals at work;
- Directive 99/92/EC on risks from explosive atmospheres (ATEX);
- Directive 2003/10/EC on risks arising from physical agents — noise — at work;
- Directive 2003/18/EC on risks related to asbestos at work;
- Directive 2004/40/EC on risks arising from physical agents — electromagnetic fields — at work.

Legislative Decree No 626/1994 did not repeal the previous legislation on safety and health at work, despite having modified and substantially integrated the content. The most important innovation of Legislative Decree No 626/1994 was the introduction of the self-protection principle, under which workers, from being passively protected persons, have become responsible for their own safety in the workplace, and thus for collective safety. Basically, according to the new legislative philosophy, safety must be organised from the bottom up and not imposed by the state. The decree recognises the principle of effective protection: all those who work in a workplace, regardless of their relationship or employment contract, have the right to be protected. Safety should no longer be enforced from the top (that is, from the employer or the owner-manager (OM) level in micro and small enterprises), as provided for in the previous regulations; rather, it should be organised through collaboration between OMs and workers and through raising awareness of the safety management policies in place. Employers, managers and health and safety officers are therefore no longer the only actors committed to checking compliance with safety rules: the entire organisation is set up to act in an integrated way to constantly check workplaces, to assess the risks and to plan prevention and protection measures that need to be implemented to improve working conditions over time.

Legislative Decree No 81/2008 brings together the existing rules related to safety and health in the workplace in a single text. This decree is applied:

- on a personal level, aiming to protect health, safety and dignity of workers, taking geographical origin and gender into account;
- at job level, to protect workers in jobs carried out in any form, in all sectors, both public and private, and is applied to employees or equivalent.

Later general updates (September 2015) of Legislative Decree No 81/2008 include the following (please note, specific information for MSEs is also reported below):

- The National Information System for the Prevention (SINP) in the workplace was established to provide data to direct, schedule, plan and evaluate the effectiveness of the prevention of accidents and occupational diseases. Data are gathered for all workers, regardless of their membership status of public insurance companies, and to address surveillance activities through the integrated use of the information available in existing information systems, and

through the integration of specific files and creating unified databases. INAIL ensures the technical and IT management of SINP.

- The obligation to draw up a register of accidents (these are in fact almost always communicated online) was eliminated.
- In high-risk industries, the monitoring activity is carried out by inspectors from the Ministry of Labour and from the local health authority responsible for the area.
- Obligations for the employer or the manager were defined as follows:
    - appointing a qualified doctor (practitioner);
    - designating in advance the workers responsible for the implementation of preventive measures, first aid or emergency management, taking into account personal abilities;
    - providing proper personal protective equipment (PPE) to workers;
    - fulfilling the obligations of information, education and training;
    - consulting the workers' representative;
    - updating the preventive measures in relation to organisational changes that are relevant to safety and health at work.
- Obligations for workers were defined as follows:
    - all workers must take care of their health and safety and that of other people in the workplace in accordance with their training, and the instructions and equipment provided by the employer.
    - workers must report to the employer, the person in charge or the workers' representative any deficiency in instrumentation or potential for a risky situation to arise.
    - workers must properly use protective equipment made available to them and participate in training programmes arranged by the employer.
- Risk evaluation was decided to be made up of the following:
- a report on the evaluation of relevant risks;
    - an indication of the prevention and protection measures and of the procedures for carrying out these measures, as well as the roles that members of the organisation have in ensuring that these measures are carried out.
    - A Prevention and protection service has to be established and organised by the employer primarily within the company, entrusting specific duties to people within the organisation or from external organisations such as employers' associations or joint bodies. The establishment of a prevention and protection service within a company or a production unit is required in, among others, industrial companies with over 200 workers and extractive industry workplaces with more than 50 workers (that is, relatively 'large' enterprises). The purposes of the service are to enable risk identification and evaluation, to define preventive measures and to provide information to workers.
    - Regular meetings to be carried out: in companies and production units employing more than 15 workers, the employer convenes a meeting at least once a year that involves the employer, the person responsible for the prevention and protection service, an advisor (if any) and the safety representative. The aims of these meetings are to identify and examine codes of conduct and 'good practices' in terms of risk and disease prevention and to improve overall safety by means of developing guidelines for an OSH management system (OSHMS). Such meetings also take place when there are significant changes in conditions that may influence risk exposure or new technologies are introduced. In production units employing up to 15 workers, the safety representative may request a special meeting.
- A safety representative is established at the regional or company level, but also at the level of specific areas of the business or individual production sites. In all companies, or production units, a safety representative is elected or appointed. In companies or establishments employing up to 15 workers, they are usually elected directly by workers. In companies or establishments with more than 15 workers, safety representatives are elected or appointed by the workers among the trade union representatives. In the absence of such representatives, the safety

representative is elected by the workers chosen among the staff. The minimum numbers of safety representatives are:

- one for companies or production units with up to 200 workers;
- three or more for companies with more than 200 workers.

Aspects of national regulation specific to MSEs include the following[1]:

- MSE OMs can draw up their risk assessment reports using a standardised and simplified document (except for a few types of risks — 'major risks') or they can delegate this activity (for example, as very often happens, to an external consultant).
- In micro enterprises employing up to five employees without significant exposure to risks, OMs can take responsibility for first aid and fire and emergency management.
- In MSEs employing up to 15 employees, the workers' safety representative (RLS, 'Rappresentante dei Lavoratori per la Sicurezza' in Italian) can be someone outside the establishment and is elected or appointed.
- In MSEs, the person responsible for the prevention and protection service can be either an employee or an external advisor.

1.1.3 Other regulations that may affect the OSH situation

Several other laws and regulations are concerned with the work environment, such as the environmental decrees, the so called 'Jobs Act' that reformed the Italian labour law between 2014 and 2015 and comprised a number of laws and decrees, the Anti-Discrimination Decree, rules about food safety and hygiene, the European Machinery Directive (2006/42/EC) and, most of all, Legislative Decree 231/2001, which is aimed at regulating management responsibility within organisations and companies, and, as a consequence, at protecting OMs from (immediate) charges of penal responsibility.

1.1.4 National OSH programmes directed towards MSEs

The Steering and Evaluation Committee for Active Policies ('Comitato per l'indirizzo e la valutazione delle politiche attive e per il coordinamento nazionale delle attività di vigilanza in materia di salute e sicurezza sul lavoro', as regulated by the already mentioned Legislative Decree No 81/2008) develops national strategies and programmes for the prevention of accidents and occupational diseases, and coordinates national surveillance activities related to safety health at work. These activities very often target MSEs explicitly.

Given that the resources that MSEs can allocate to OSH management are typically scarce, INAIL provides MSEs with the technical and IT support needed to carry out this activity. Information flows are focused on production and occupational systems, risk prevention (also in a gender-oriented way), prevention interventions, health surveillance and accidents below the compensation threshold established by INAIL (the compensation threshold is relative to the obligation to report the accident to INAIL for absences from work of at least 3 days, excluding the day on which the accident occurred). In general terms, INAIL promotes a participatory model involving the institutions, social partners, and other bodies and organisations operating in the field. It works to foster, through training, information and funding, a substantial reduction in the human and economic costs due to accidents at work and occupational diseases. These costs weigh on single workers, companies and the entire production system of the country. When it comes to the resources devoted to OSH programmes, a total of about EUR 1.2 billion (non-refundable) has been allocated by INAIL in calls for tender since 2010. In 2014, MSEs accounted for 93 % of all enterprises that obtained contributions from this funding. The percentage of micro enterprises (1-10 employees) admitted to INAIL calls gradually increased from 45 % in 2010 to 61 % in 2014.

Some other national programmes specific to MSEs are described below:

[1] Please refer to http://www.lavoro.gov.it/priorita/Pagine/Testo-Unico-sulla-salute-e-sicurezza-sul-lavoro.aspx for the latest official updates.

- MSEs, as well as medium-sized enterprises, can access free funds to train their employees from employers' organisations or from trade unions.
- Almost every year, INAIL offers free funds for technical interventions and training; those funds mainly target MSEs.
- MSEs can benefit from the work of INAIL that resulted in 'guidelines for the implementation of an OSH management system within MSEs' ('Linee di Indirizzo SGSL-MPI', in Italian (INAIL, 2011)).

1.1.5 Industrial relations and worker representation

Italian law identifies in the National Collective Bargaining Agreement ('Contratto Collettivo Nazionale del Lavoro' — CCNL — in Italian) the normative source through which trade union organisations and employers' associations define and agree the rules governing the employment relationship. In Italy, collective bargaining in the private sector primarily takes place at two levels: industry level and company level. Industry-level negotiations concern both the regulatory and economic aspects of the relationship and involve the employers' federations and industrial unions. At company level, negotiations deal with particular aspects of the company (for example productivity, job losses) and involve the elected union committee, the RSU ('Rappresentanza Sindacale Unitaria'), which is the main employee representative body and is elected by all employees, even if candidates are often nominated by the unions. As per a major agreement signed in 2013, company agreements can modify industry agreements, but only if the industry-level agreement itself permits this. An RSU is allowed in enterprises with more than 15 employees (this comprises a minimum of three employee representatives when the number of employees ranges between 16 and 200), but it is also possible to have an RSU that covers a group of small companies in a particular area. The main function of RSUs is to negotiate with the employer at company level. Subcommittees on particular issues can be set up internally, such as on health and safety or work organisation (Fulton, 2015). On the other hand, employers must, by law, inform and consult with RSUs on specific topics, such as health and safety.

Employee health and safety representation is provided by safety representatives at company level (a company safety representative is known as an RLS, 'Rappresentante dei Lavoratori per la Sicurezza' in Italian), at geographical area level (an area safety representative is known as an RLST, 'Rappresentante dei Lavoratori per la Sicurezza Territoriale' in Italian), and at production site level (site safety representatives; 'Rappresentante dei Lavoratori per la Sicurezza di sito produttivo' in Italian). The number of company safety representatives is regulated by collective agreement but the law also sets minimum numbers (for example one in enterprises with up to 200 employees). Company safety representatives in enterprises with more than 15 employees participate in health and safety meetings with the employer, which should take place at least once a year or when there are major changes. Area safety representatives cover companies that do not have their own company safety representative, generally smaller companies. Site safety representatives coordinate several companies that share a single site (for example a construction site). Company safety representatives should have access to the workplace, while area safety representatives should give prior notice of their intention to visit the workplace, except in the case of a serious accident. Company safety representatives in companies with up to 15 employees are elected directly by the employees. In companies with more than 15 employees, they are elected or chosen by the RSU (if any); otherwise, they are chosen directly by the employees themselves (Fulton, 2013).

In Italy, overall union density among employees is around a third (37.2 % in 2013 (Visser, 2015)), but is deemed to be very low in smaller companies (8.3 % in enterprises with 5-9 employees and 27.2 % in enterprises with 10-49 employees (EU-OSHA, 2014)). There are three main trade union confederations in Italy, although there are also other groupings of trade unions and some unions for particular industries and occupations that are not attached to any of the three abovementioned confederations. About half of trade union members are pensioners (Fulton, 2015). In Italy, there is also a strong presence of employers' associations at local and national level, often (also) representing companies from similar types of sector. Often, associations that belong to the same macro-productive sector as univocally

identified by a NACE (Statistical classification of economic activities in the European Community) grouping come together to form a confederation.

1.2 Characterisation of MSEs in Italy

1.2.1 Economic profile of MSEs

According to the latest census (2011) of Industry and Services ('Censimento dell'Industria e dei Servizi') carried out by the Italian National Institute of Statistics (ISTAT)[2], 99.5 % of establishments are either micro or small, as displayed in Table 1. Medium-sized companies account for 0.4 % of all companies, while large companies account for 0.1 %. In particular, 58.7 % of all Italian enterprises are companies with sole proprietorship. The economic sectors under consideration in this project (agriculture, manufacturing, construction, wholesale and retail, transportation and storage, hotel, restaurant and catering (HORECA), and health) account for 65.8 % of all active establishments in Italy (65.3 % if only MSEs are considered). Of the number of active establishments in those economic sectors, the wholesale and retail, construction, manufacturing, HORECA, health, and transportation and storage sectors have a far more significant presence than the agriculture sector (which is not so significant in Italy when it comes to the number of enterprises). The same applies when it comes to the number of employees (Table 2), which again shows the relatively low number of establishments and employees in the agriculture sector in Italy, as well as the health sector (that is, the health sector is not so significant in Italy when it comes to the number of employees).

Table 1 Number of active enterprises per size and selected sector in Italy

NACE Classification — CENSUS 2011	Sole proprietorship	2-5 employees	6-9 employees	10-19 employees	20-49 employees	50-249 employees	250+ employees	SUBTOTALS and GRAND TOTAL
Total Italy	*2,477,500*	*1,316,025*	*215,876*	*134,519*	*52,495*	*20,838*	*3,468*	*4,220,721*
Agriculture… (A)	13,551	7,126	1,111	564	299	72	1	22,724
Manufacturing (C)	135,867	150,863	48,184	43,216	20,752	8,778	1,227	408,887
Construction (F)	315,228	174,643	31,947	18,220	5,613	1,335	83	547,069
Wholesale and retail… (G)	646,678	394,876	51,121	27,663	8,820	2,761	470	1,132,389
Transportation… (H)	69,128	36,473	9,054	6,888	3,669	1,828	335	127,375
HORECA (I)	89,913	156,304	30,462	13,776	3,211	632	104	294,402
Human health and social… (Q)	184,803	52,829	3,981	1,725	830	645	95	244,908
SUBTOTALS and GRAND TOTAL	*1,455,168*	*973,114*	*175,860*	*112,052*	*43,194*	*16,051*	*2,315*	*2,777,754*
	34.5 %	*23.1 %*	*4.2 %*	*2.7 %*	*1.0 %*	*0.4 %*	*0.1 %*	*65.8 %*
NACE Classification — CENSUS 2011	Sole proprietorship	2-5 employees	6-9 employees	10-19 employees	20-49 employees	50-249 employees	250+ employees	SUBTOTALS and GRAND TOTAL

[2] I.Stat is the warehouse of statistics produced by ISTAT; available at: http://dati.istat.it/?lang=en&SubSessionId=22b72fba-9e2c-4d69-bc10-d93042b4d07a&themetreeid=-200 (last accessed 02/04/2017).

NACE Classification — CENSUS 2011	Sole proprietorship	2-5 employees	6-9 employees	10-19 employees	20-49 employees	50-249 employees	250+ employees	SUBTOTALS and GRAND TOTAL
Total Italy (%)	*58.7 %*	*31.2 %*	*5.1 %*	*3.2 %*	*1.2 %*	*0.5 %*	*0.1 %*	*100.0 %*
Agriculture… (A)	*0.3 %*	*0.2 %*	*0.0 %*	*0.0 %*	*0.0 %*	*0.0 %*	*0.0 %*	0.5 %
Manufacturing (C)	*3.2 %*	*3.6 %*	*1.1 %*	*1.0 %*	*0.5 %*	*0.2 %*	*0.0 %*	9.7 %
Construction (F)	*7.5 %*	*4.1 %*	*0.8 %*	*0.4 %*	*0.1 %*	*0.0 %*	*0.0 %*	13.0 %
Wholesale and retail… (G)	*15.3 %*	*9.4 %*	*1.2 %*	*0.7 %*	*0.2 %*	*0.1 %*	*0.0 %*	26.8 %
Transportation… (H)	*1.6 %*	*0.9 %*	*0.2 %*	*0.2 %*	*0.1 %*	*0.0 %*	*0.0 %*	3.0 %
HORECA (I)	*2.1 %*	*3.7 %*	*0.7 %*	*0.3 %*	*0.1 %*	*0.0 %*	*0.0 %*	7.0 %
Human health and social… (Q)	*4.4 %*	*1.3 %*	*0.1 %*	*0.0 %*	*0.0 %*	*0.0 %*	*0.0 %*	5.8 %
SUBTOTALS and GRAND TOTAL	*34.5 %*	*23.1 %*	*4.2 %*	*2.7 %*	*1.0 %*	*0.4 %*	*0.1 %*	*65.8 %*

(Census 2011, elaborated from source: i.Stat)

Table 2 Number of persons employed in active enterprises per size and selected sector in Italy

NACE Classification - CENSUS 2011	Sole proprietorship	2-5 employees	6-9 employees	10-19 employees	20-49 employees	50-249 employees	250+ employees	SUBTOTALS and GRAND TOTAL
Total Italy	*2,477,500*	*3,679,998*	*1,541,699*	*1,765,060*	*1,561,049*	*2,013,721*	*3,385,059*	*16,424,086*
Agriculture… (A)	13,551	20,919	7,816	7,476	8,850	5,557	344	64,513
Manufacturing (C)	135,867	457,319	349,511	578,258	624,600	853,298	893,130	3,891,983
Construction (F)	315,228	496,103	228,020	235,829	161,175	113,002	50,876	1,600,233
Wholesale and retail… (G)	646,678	1,076,002	362,939	359,792	259,791	256,325	480,990	3,442,517
Transportation… (H)	69,128	104,369	65,561	91,169	111,583	182,274	469,869	1,093,953
HORECA (I)	89,913	459,889	216,133	176,481	89,664	56,353	132,096	1,220,529
Human health and social… (Q)	184,803	136,998	27,953	22,417	25,925	65,249	55,595	518,940
SUBTOTALS and GRAND TOTAL	*1,455,168*	*2,751,599*	*1,257,933*	*1,471,422*	*1,281,588*	*1,532,058*	*2,082,900*	*11,832,668*
	8.9 %	*16.8 %*	*7.7 %*	*9.0 %*	*7.8 %*	*9.3 %*	*12.7 %*	*72.0 %*
NACE Classification - CENSUS 2011	Sole proprietorship	2-5 employees	6-9 employees	10-19 employees	20-49 employees	50-249 employees	250+ employees	SUBTOTALS and GRAND TOTAL
Total Italy (%)	*15.1 %*	*22.4 %*	*9.4 %*	*10.7 %*	*9.5 %*	*12.3 %*	*20.6 %*	*100.0 %*
Agriculture… (A)	*0.1 %*	*0.1 %*	*0.0 %*	*0.0 %*	*0.1 %*	*0.0 %*	*0.0 %*	0.4 %
Manufacturing (C)	*0.8 %*	*2.8 %*	*2.1 %*	*3.5 %*	*3.8 %*	*5.2 %*	*5.4 %*	23.7 %

NACE Classification - CENSUS 2011	Sole proprietorship	2-5 employees	6-9 employees	10-19 employees	20-49 employees	50-249 employees	250+ employees	SUBTOTALS and GRAND TOTAL
Construction (F)	*1.9 %*	*3.0 %*	*1.4 %*	*1.4 %*	*1.0 %*	*0.7 %*	*0.3 %*	9.7 %
Wholesale and retail… (G)	*3.9 %*	*6.6 %*	*2.2 %*	*2.2 %*	*1.6 %*	*1.6 %*	*2.9 %*	21.0 %
Transportation… (H)	*0.4 %*	*0.6 %*	*0.4 %*	*0.6 %*	*0.7 %*	*1.1 %*	*2.9 %*	6.7 %
HORECA (I)	*0.5 %*	*2.8 %*	*1.3 %*	*1.1 %*	*0.5 %*	*0.3 %*	*0.8 %*	7.4 %
Human health and social… (Q)	*1.1 %*	*0.8 %*	*0.2 %*	*0.1 %*	*0.2 %*	*0.4 %*	*0.3 %*	3.2 %
SUBTOTALS and GRAND TOTAL	*8.9 %*	*16.8 %*	*7.7 %*	*9.0 %*	*7.8 %*	*9.3 %*	*12.7 %*	*72.0 %*

(Census 2011, elaborated from source: i.Stat)

Given the above considerations, the manufacturing, construction, wholesale and retail, transportation and storage, and HORECA sectors are the most relevant for the Italian case and will be further developed in the following report.

In terms of added value (Table 3), the manufacturing, and wholesale and retail sectors are extremely important, which is reflected in the number of employees in these sectors.

Table 3 Added value at factor cost per size and selected sector in Italy — thousands of euros

NACE Classification - CENSUS 2011	Sole proprietorship	2-9 employees	10-19 employees	20-49 employees	50-249 employees	250+ employees	SUBTOTALS and GRAND TOTAL
Total Italy	*72,433,606*	*136,778,802*	*69,517,945*	*76,052,590*	*120,920,397*	*212,513,180*	*688,216,520*
Manufacturing (C)	2,488,095	21,801,935	23,467,528	31,739,390	56,514,865	68,041,850	204,053,663
Construction (F)	6,771,838	25,533,771	7,534,200	5,773,999	4,932,581	3,539,136	54,085,525
Wholesale and retail… (G)	11,901,586	52,029,608	15,372,111	13,008,887	15,720,271	26,078,916	134,111,379
transportation… (H)	1,814,810	9,133,673	3,866,897	5,439,806	7,684,141	30,714,590	58,653,917
HORECA (I)	1,138,940	16,866,068	4,986,543	3,157,116	2,432,700	3,860,214	32,441,581
SUBTOTALS and GRAND TOTAL	*24,115,269*	*125,365,055*	*55,227,279*	*59,119,198*	*87,284,558*	*132,234,706*	*483,346,065*
	3.5 %	*18.2 %*	*8.0 %*	*8.6 %*	*12.7 %*	*19.2 %*	*70.2 %*
NACE Classification - CENSUS 2011	Sole proprietorship	2-9 employees	10-19 employees	20-49 employees	50-249 employees	250+ employees	SUBTOTALS and GRAND TOTAL
Total Italy (%)	*10.5 %*	*19.9 %*	*10.1 %*	*11.1 %*	*17.6 %*	*30.9 %*	*100.0 %*
Manufacturing (C)	*0.4 %*	*3.2 %*	*3.4 %*	*4.6 %*	*8.2 %*	*9.9 %*	29.6 %
Construction (F)	*1.0 %*	*3.7 %*	*1.1 %*	*0.8 %*	*0.7 %*	*0.5 %*	7.9 %
Wholesale and retail… (G)	*1.7 %*	*7.6 %*	*2.2 %*	*1.9 %*	*2.3 %*	*3.8 %*	19.5 %

NACE Classification - CENSUS 2011	Sole proprietorship	2-9 employees	10-19 employees	20-49 employees	50-249 employees	250+ employees	SUBTOTALS and GRAND TOTAL
Transportation... (H)	*0.3 %*	*1.3 %*	*0.6 %*	*0.8 %*	*1.1 %*	*4.5 %*	8.5 %
HORECA (I)	*0.2 %*	*2.5 %*	*0.7 %*	*0.5 %*	*0.4 %*	*0.6 %*	4.7 %
SUBTOTALS and GRAND TOTAL	*3.5 %*	*18.2 %*	*8.0 %*	*8.6 %*	*12.7 %*	*19.2 %*	*70.2 %*

(Data 2014, elaborated from source: i.Stat)

The five sectors under consideration account for 70.2 % of the total added value in Italy and 81.7 % of total turnover in Italy (Table 4).

Table 4 Turnover per size and selected sector in Italy — thousands of euros

NACE Classification - CENSUS 2011	Sole proprietorship	2-9 employees	10-19 employees	20-49 employees	50-249 employees	250+ employees	SUBTOTALS and GRAND TOTAL
Total Italy	*216,688,798*	*540,288,657*	*312,525,137*	*350,355,799*	*634,499,470*	*889,876,672*	*2,944,234,533*
Manufacturing (C)	10,979,360	71,674,803	83,750,803	123,550,504	246,440,006	331,119,056	867,514,532
Construction (F)	29,764,893	83,376,863	26,896,166	21,303,870	18,941,363	17,224,589	197,507,744
Wholesale and retail... (G)	67,253,246	378,306,692	123,897,066	121,516,930	191,893,628	208,192,559	1,091,060,121
Transportation... (H)	8,108,912	34,997,814	14,146,275	19,105,559	28,969,954	60,714,567	166,043,081
HORECA (I)	4,367,221	45,206,654	12,139,976	7,456,889	5,452,126	9,159,166	83,782,032
SUBTOTALS and GRAND TOTAL	*120,473,632*	*613,562,826*	*260,830,286*	*292,933,752*	*491,697,077*	*626,409,937*	*2,405,907,510*
	4.1 %	*20.8 %*	*8.9 %*	*9.9 %*	*16.7 %*	*21.3 %*	*81.7 %*

NACE Classification - CENSUS 2011	Sole proprietorship	2-9 employees	10-19 employees	20-49 employees	50-249 employees	250+ employees	SUBTOTALS and GRAND TOTAL
Total Italy (%)	*7.4 %*	*18.4 %*	*10.6 %*	*11.9 %*	*21.6 %*	*30.2 %*	*100.0 %*
Manufacturing (C)	*0.4 %*	*2.4 %*	*2.8 %*	*4.2 %*	*8.4 %*	*11.2 %*	29.5 %
Construction (F)	*1.0 %*	*2.8 %*	*0.9 %*	*0.7 %*	*0.6 %*	*0.6 %*	6.7 %
Wholesale and retail... (G)	*2.3 %*	*12.8 %*	*4.2 %*	*4.1 %*	*6.5 %*	*7.1 %*	37.1 %
Transportation... (H)	*0.3 %*	*1.2 %*	*0.5 %*	*0.6 %*	*1.0 %*	*2.1 %*	5.6 %
HORECA (I)	*0.1 %*	*1.5 %*	*0.4 %*	*0.3 %*	*0.2 %*	*0.3 %*	2.8 %
SUBTOTALS and GRAND TOTAL	*4.1 %*	*20.8 %*	*8.9 %*	*9.9 %*	*16.7 %*	*21.3 %*	*81.7 %*

(Data 2014, elaborated from source: i.Stat)

1.2.2 OSH profile of MSEs compared with larger enterprises

There is evidence from national and local databases/sources (for example i.Stat, INAIL reports, governmental reports), as well as from specific studies (for example see Micheli and Cagno, 2010) that both micro and small enterprises have extreme difficulty — even in comparison with only medium-sized enterprises — in acquiring in-depth knowledge of their OSH regulatory obligations and really understanding which actions to undertake or not in order to improve health and safety conditions and to comply with regulatory requirements. There are several reasons for this, such as difficulties in understanding the legislation and its implications, or a lack of time, an issue that commonly affects people working in MSEs. Nonetheless, the frequency of accidents seems to be higher among only micro-sized enterprises, while it is relatively similar among SMEs. However, a systematic underreporting bias — particularly among micro and small establishments — must be taken into account (Micheli and Cagno, 2010).

2 Description of the fieldwork and sample

2.1 General remarks on the fieldwork and the methods used

The selected enterprises were MSEs present in the Italian market and from five different sectors (the target sectors):

- manufacturing;
- construction;
- wholesale and retail;
- HORECA;
- transporting and storage.

For each sector, a minimum of three companies (one of 5-9 employees, one of 10-19 employees, one of 20-49 employees) was selected to be interviewed. This approach was chosen in order to collect data for at least one company per size category. Having a sample of companies of different sizes that provided information for different situations allowed a qualitative analysis that fit with the goals of the study.

Companies were selected in different geographical areas in the Italian territory, but mainly in northern Italy (specifically the Lombardy region). This is because the majority of selected companies were contacted through professional contacts of the research team, as only a few companies were available from the list of respondents to the Second European Survey of Enterprises on New and Emerging Risks (ESENER-2). The initial contact was made by phone, to check the availability of the OM, then to arrange an appointment for the interview. To get in touch with enterprises not included in the list of respondents to ESENER-2, the contribution of API Lecco (an association of SMEs in the manufacturing sector) was fundamental. In fact, API Lecco either enabled direct contact to be made with some companies or acted as an intermediary. In total, 72 enterprises were contacted (that is, contact was made with the OMs of 72 enterprises rather than just receptionists or no contact at all), and 22 of them agreed to participate in this study.

Interviews with workers lasted between 30 and 45 minutes each and interviews with OMs lasted between 45 and 75 minutes each. Interviews were conducted in the interviewee's office. The interviews were recorded (with the agreement of participants) and the interviewer also took notes. All the recorded material was fully transcribed verbatim.

The initial plan was to study 20 cases to synchronise with the SESAME project (EU-OSHA, 2018). However, for practical reasons (availability of companies and time) the final number of cases studied was 22. Two interviews were conducted for each company, to include the views of both the employer and the employee and to allow a comparison.

To create breadth and depth in the selection of cases, some company features were studied before the interviews were scheduled. For example, cases were carefully selected to include micro and small firms of different sizes. In fact, for micro firms, the minimum number of employees was set at five, whereas small firms were divided into two subgroups (size classes): from 10 to 19 employees and from 20 to 49 employees. Furthermore, for each size class, and for each sector, at least two cases were covered.

2.2 Description of the sample

Table 5 includes a brief summary of the 22 companies interviewed.

Table 5 Summary of the interviewed companies

ER CODE	Case number	Number of employees	Sector	Type of Ownership	Customers	Main business functions
IT_C3_01	IT01	Small (20-49)	Manufacturing	Independent	B2B	Band-sawing machine
IT_C3_02	IT02	Small (20-49)	Manufacturing	Independent	B2C	Conveyor systems

ER CODE	Case number	Number of employees	Sector	Type of Ownership	Customers	Main business functions
IT_C2_03	IT03	Small (10-19)	Manufacturing	Independent	B2B	Automotive special spare parts and braking systems
IT_C2_04	IT04	Small (10-19)	Manufacturing	Independent	B2C	Doors and windows market
IT_C1_05	IT05	Micro (5-9)	Manufacturing	Independent	B2B	Screw-cylinder-gear systems
IT_C2_06	IT06	Small (10-19)	Manufacturing	Independent	B2B	Elastic bands
IT_C3_07	IT07	Small (20-49)	Manufacturing	Subsidiary	B2B	Automotive, hydraulics, carpentry and metal ware industries
IT_C2_08	IT08	Small (10-19)	Manufacturing	Independent	B2B	Punching and shearing lines
IT_F1_01	IT09	Micro (5-9)	Construction	Independent	B2B	Installation of thermal, heating and air conditioning systems
IT_F3_02	IT10	Small (20-49)	Construction	Independent	B2B	Civil construction
IT_F3_03	IT11	Small (20-49)	Construction	Independent	B2C	Installation of electrical systems
IT_F2_04	IT12	Small (10-19)	Construction	Independent	B2B & B2C	Carpentry, plumbing, electricians, painters, ground service work
IT_I3_01	IT13	Small (20-49)	HORECA	Franchise	B2C	Catering service within a hospital unit
IT_I1_02	IT14	Micro (5-9)	HORECA	Independent	B2C	Typical bar foods and beverages
IT_I2_03	IT15	Small (10-19)	HORECA	Subsidiary	B2C	Typical bar foods and beverages
IT_I1_04	IT16	Micro (5-9)	HORECA	Franchise	B2C	Typical bar foods and beverages
IT_H3_01	IT17	Small (20-49)	Transporting and storage	Independent	B2B & B2C	Express shipping, special load deliveries
IT_H3_02	IT18	Small (20-49)	Transporting and storage	Independent	B2B & B2C	Nationwide transport and shipping
IT_G1_01	IT19	Micro (5-9)	Wholesale and retail	Independent	B2C	Repair service of road vehicles
IT_G1_02	IT20	Micro (5-9)	Wholesale and retail	Independent	B2C	Doors and windows market
IT_G3_03	IT21	Small (20-49)	Wholesale and retail	Subsidiary	B2C	Car body shop
IT_G1_04	IT22	Micro (5-9)	Wholesale and retail	Independent	B2C	Car repair shop

Independent companies accounted for 17 of the 22 companies interviewed; five were part of larger groups or consortiums, with two of these from the HORECA sector: one coffee shop, which is part of a chain of stores (franchise); and a hospital catering firm, which is part of a larger business network of several companies that focus on catering, engineering, restructuring kitchens and hotel management. One company from the manufacturing sector, which specialises in the manufacturing of steel wires, rods and derivatives, is part of a group of four businesses that have a common vision on the quality of customer service. Each of these four businesses operates in a different industrial field (automotive, aerospace, construction, energy) and the case company from the manufacturing sector produces mechanic elements used in various industries (automotive, hydraulics, carpentry and metal wares). The fourth case is a showroom in the wholesale and retail sector, which is owned by the manager of a company interviewed in the manufacturing sector. The fifth case is also from the wholesale and retail sector: a car body shop that is part of a group of companies with five other branches.

Three companies in the HORECA sector, two in the manufacturing sector and one each in the construction sector and the wholesale and retail sector were located in the south of Italy. The remaining 15 companies were all situated in the Lombardy region in the north of Italy, except for one company located in central Italy.

In total, 44 people were interviewed. Of these, 22 were managers, including 18 who were OMs: five were OMs of establishments in the micro category, four in the 10-19 employees' category and nine in the 20-49 employees' category. Moreover, seven were OMs in manufacturing, two in HORECA, four in the construction sector, three in the wholesale and retail sector, and two in the transporting and storage sector.

The ages of the OMs were equally distributed over the age groups '30-40', '40-50' and '50-60', while there were only three managers in the 'Over 60' group. It is worth noting that all four OMs of companies belonging to the HORECA sector were aged between 30 and 40.

Regarding the level of education of OMs, more than half of all the interviewed OMs had a high school diploma. However, the level of education varied. Two OMs from the manufacturing sector, two from the wholesale and retail sector and one from the construction sector held a university degree. However, it must be noted that the OM of one company from the wholesale and retail sector is the same employer in a workplace from the manufacturing sector. Three OMs from the construction sector were poorly educated, as their education consisted of only a lower secondary school diploma.

The 22 workers interviewed were directly selected by the manager or the OM at the time the interview took place. As a result, almost all those selected met the criteria of the project (that is, an employee who had worked at the establishment for some time and was familiar with its arrangements). In fact, in four out of five sectors (all but the HORECA sector), the workers interviewed all had long-standing experience within the company, as they had worked at the establishment for at least 10 years (in some cases even more than 20 or 30 years). They were selected because of their role as the person in charge of emergency and fire procedures or the person responsible for the prevention and protection service (RSPP from the Italian definition), or because they were involved in significant interventions, directly or indirectly, to address safety issues. Furthermore, especially in the manufacturing sector, the workers interviewed were almost all workers with responsibilities: they were in charge of quality management, which very often includes dealing with safety issues among its main tasks. Furthermore, they were supply chain managers or warehouse managers and production managers or supervisors having recurring contact with the other actors in the supply chain and with workers. In addition, even when the worker had no position of responsibility, he or she was an experienced person or had previous professional experiences in the same or in other sectors. A different situation was found in the HORECA sector, as the worker was often a newly hired employee. This was usually because this was the only worker available at the time. Other exceptions to this are a young worker from the wholesale and retail sector and a worker of a car body shop who had joined the company about a year earlier. Given this situation, it was not possible to analyse specific employment pattern characteristics associated with the high vulnerability of employees (for example subcontractors, atypical working time arrangements) in these cases, and so wider and more integrated descriptions of the establishments' situations and more informed answers about the research themes were gathered.

Thirty-nine of the interviewees were male and only five were female (only OMs).

A few of the managers and OMs had previous OSH education. For most of them, their experience with business and OSH issues were gained during the years within the company and through the mandatory training courses attended.

There are two exceptions to the above. The first is the case of a female OM from the manufacturing sector who personally attended a volunteer course (first aid course for companies) run by the Italian Red Cross. The second concerns the OM of a transport company who is also vice-president of the Italian Carrier Federation and a member of an employers' association executive board; in the past, because of these roles, he had to attend specific training courses on OSH.

The same was found regarding the membership of professional associations. Most of the managers and OMs are not members of a professional association. Exceptions to this are the OM of a coffee shop and the OM of a company from the construction sector in the micro size class, two OMs of companies from the manufacturing sector and two from the transporting and storage sector (20-49 employees).

Finally, the situation is very mixed concerning previous professional experience of interviewees. The most important differences occur in the manufacturing sector where three of the OMs report previous professional experience: two have worked in the same company but as employees, and one (the manager of a carpentry workshop and of a showroom) has previously worked for another company in a different sector (financial advisory). Two OMs in the construction sector have also previously worked in the same company or in the same sector. Finally, one out of four OMs in the HORECA sector had worked in a similar company before setting one up on their own.

In the manufacturing sector, most of the workforce is employed on a permanent, full-time basis, but there are exceptions. Two firms use an external consultant for technical assistance and rely on a temporary employment agency that provides workers when needed; furthermore, one of these two firms also has a partnership with a private for some small jobs performed by hand (textile activities). There is also a partnership between a manufacturing company and a local university, which has led to the availability of some temporary positions for graduate and near-to-graduate students, who work as trainees. As expected, the use of temporary staff or seasonal workers is widespread during employees' holidays periods or in the case of long-term sick leave in the HORECA sector. Moreover, the employment contracts are often fixed-term contracts for young workers, whose presence in the HORECA sector is very strong.

The widespread use of external workforce in the construction sector has allowed construction companies to overcome issues related to the economic crisis by reducing the excessive fixed costs associated with directly employing a large number of workers. This is in line with numerous studies that have identified the extensive use of subcontracting in the construction industry. Poor management in relation to such subcontracting is described as an important contributor to the occurrence of accidents and associated injuries.

The evolution of employee numbers throughout companies' histories has remained, in many cases, fairly constant or has increased to a small extent. However, there are some exceptions to this, too. In fact, alternative downsizing and expansion has taken place during the lifespans of some companies and this was observed in different sectors. This situation was observed in almost all of the industrial sectors of interest. There have also been staff reductions and layoffs as a result of the economic crisis, as in the case of a company in the wholesale and retail sector; because of the spending reviews of the parent company in the HORECA sector; or because of the contraction of markets and the transition from working in shifts to working 'from day to day' in a company in the manufacturing sector.

However, there are also instances in which the number of employees has grown in parallel with the financial situation of the company or because of the company's entrance into new markets, as is the case for three companies, one in the wholesale and retail sector (a 70 % increase in the number of employees), one in the construction sector (a 50 % increase) and one in the transporting and storage sector (an increase in the number of lorry drivers). All three of these companies belong to the largest size group in the study (20-49 employees).

The wage level, as described above, is regulated by a collective type of agreement and the cases in which wages are above average are linked to high levels of qualifications and specialisation of workers and their shortage in the specific industry. An OM from the manufacturing sector said:

'I should steal them from other companies, but then I would have to pay them more … as well as all my employees' (company IT05).

The percentage of women employed in the establishments visited is relatively high, but their duties are limited to mainly office work and administrative activities. Furthermore, other than in companies that carry out activities traditionally undertaken by women (e.g. activities related to textiles or catering), the number of permanent women workers was small. Of the companies visited, the only company that mentioned having women working on the shop floor was a company in the manufacturing sector.

3 Analysis — data from the establishment reports (case studies)

3.1 Risk awareness

There are various kinds of risks in the manufacturing sector, and the risks in the companies examined reflect known risks. The most frequent type of risk is physical strain, which could lead to accidents and injuries such as:

- burns;
- cuts to the fingers;
- dislocations;
- falls and slips;
- crushing of hands;
- splinters in the eye;
- hits from falling materials;
- bruises and abrasions as a result of working with tools such as drills and welding machines;
- accidents and injuries linked to electrical components.

The same situation can be found in the construction sector; for example, a manager stated that:

'this kind of risks are on the agenda with manual activities' (company IT09).

Several statements support this understanding of industrial processes and activities. The most representative was made by an OM of a manufacturing firm:

'The only way to avoid problems is to put a wall against the plant to keep out people' (company IT05).

Furthermore, in the construction sector, the only fatal accident that was reported was where a worker was crushed by a vehicle on a building site. This was confirmed by the worker interviewed from that company, although he explained that in his opinion it had been the worker's own fault:

'The worker who died was a person with a lot of experience and the site was absolutely free of hazards ... the operator had himself prepared all the equipment. I think it was carelessness ...' (company IT10).

The carelessness and negligence of workers seem to be the major drivers of accidents according to the OMs' and workers' points of view. In fact, many managers and workers declared that accidents only happen when they are caused by an operator's inattention, distraction or overconfidence.

Some employers do not consider that minor accidents are worth worrying about. In fact, recurring catchphrases are something like *'I have never had an injury in this company*'. However, even if the manager is not necessarily lying, it seems unlikely that in several years of activity there have been no accidents, even minor ones, considering the current situation of these kind of businesses.

The manufacturing and construction sectors, together with the wholesale and retail sector, are also affected by a high level of ergonomic strains. The following belong to this category of risks:

- strains as a result of the manual handling of heavy loads;
- exposure to noise caused by machines in operation;
- exposure to vibrations;
- long working time at extreme temperatures;
- uncomfortable positions held for long periods of time during car repair.

In the wholesale and retail sector, as well as in the transporting and storage sector, ergonomic risks and to a lesser extent chemical and biological risks are sources of concern. However, work-related diseases due to ergonomic strains or chemical risks were identified in the sample infrequently. In the transporting and storage sector, of the chemical or biological risk is more apparent in the context of the transportation of dangerous goods.

The inhalation of powder/dust, the incorrect use of chemicals during sanitising operations of places and equipment, and hazardous waste disposal are all examples of causes of diseases in the case companies. In particular, in the car repair sector (within the wholesale and retail sector), working with substances such as petrol, waste oil, acid batteries, paints and solvents can damage the skin. Moreover, automobile exhaust emissions, solvents and spray vapours, if inhaled, can seriously damage health or can even be deadly. This is a real risk and, according to one OM, *'there is little to be done'* (company IT19).

During the interviews, psychosocial risks were explicitly mentioned only once. In this case (company IT20), the following entries were considered:

- stress;
- work overload;
- repetitive work in some activities such as those of lorry drivers;
- feeling bored at work because of the tediousness of the job;
- 'violence' from clients, in the sense that higher pressure is associated with the high demands of customers.

A worker from the transporting and storage sector showed some sort of awareness of psychosocial risk when considering the differences regarding work pressures between his role as a worker with assigned tasks and that of the lorry drivers:

'My job is not monotonous, everyday there are different tasks to fulfil. However, the same cannot be said for the lorry drivers who have to drive for hours. This is a high risk to themselves and to other people' (company IT17).

Two main categories of risk have been identified: process-specific risks and general risks. The general risks category is essentially made up of psychosocial risks (work overload, stress, monotonous work, and so on). Process-specific risks are less critical if compared with general risks, because, when OMs spot these risks, they are typically able to provide a proper solution, and the workers have a perception of this.

The situation is different for general risks, which are perceived more frequently by workers than by the OM.

The basic problem is that OMs must handle many different issues at the same time. They have a distorted perception of their firms' problems, as they wrongly believe that they are the most stressed and under pressure person in the firm, neglecting the workers' problems. Workers therefore have a greater feeling of the general risk in their job than the OM. However, they do not attach much importance to these general risks because OMs do not consider them.

The size of the firms is also one of the cross-sectoral characteristics and therefore for process-specific risks it is fair to consider each industry sector in turn. For the general risks, in micro and the smaller of the small companies, the problem is often the lack of awareness of the OM and the way in which the business is managed, and this is true regardless of the sector.

3.2 Company OSH organisation and risk management practices

According to the majority of interviewees, the obligation to wear PPE (safety shoes, gloves, ear protectors, goggles, high-visibility vests, and so on), mandatory annual safety courses and the long-standing experience of both the management and the workforce in carrying out the day-to-day business activities seem to be sufficient to maintain an acceptable level of risk awareness in the companies.

In general, according to the OMs, there have never been accidents in their companies. This is debatable as cuts, burns, falls, slips, bruises and so on are seen as part of 'the normal day's programme' in these industrial sectors. In a non-negligible number of cases, although the OMs declare that no severe accident has ever happened, the workers disagree with this assertion. Accidents and injuries, even if minor, have in fact occurred in all the study cases, although some OMs believed that confessing to this would be an 'admission of guilt'. By contrast, many of the accidents that occurred throughout a company's history were mentioned by workers.

Accidents are frequently seen, by both managers and workers, as being 'part of the job' and are perceived to be mainly the result of workers' carelessness or negligence. A number of examples of reported accidents follows below:

- While the OM declared that no major accident had ever happened, the worker stated that some years before, perhaps before a change of ownership, there was a severe accident (hand injury) to an employee of an external firm during the maintenance of a machine (company IT03).
- Among the main accidents and injuries occurring throughout the company's history, the OM indicated some with which he had direct experience. An example was given of the OM's son. When he saw an exposed resistor, which was to be replaced, he thought it was off and tried to move it. Subsequently, he severely burned his hand. Another case of injury happened about 2 months before during the rubber vulcanisation process. The operator did not pay much attention to the vulcanisation temperature; therefore, when the temperature was over 70 degrees, a small steel element shot the worker in the abdomen and he missed 3 days of work (company IT05).
- The OM acknowledged the fact that severe accidents happened in his company and he described two of the most recent ones. One of these two accidents happened a month before the interview when a worker was run over by a forklift. The worker was not wearing a safety vest while walking in a blind spot of the production area. The worker interviewed was present the time of the accident and he described the injury to the worker's legs as very severe. Another example was a smashed hand during the loading operation of raw materials. This accident was one of the reasons why the company decided to invest in a new lifting system that uses self-centring magnets to replace the old and outdated system that used lifting ropes (company IT07).
- The manager admitted that there had been some injuries in the past but they had not been severe, especially in the recent past. He believed that the risks that may occur during the handling of heavy materials, during loading or unloading, or the crushing of hands and other dangers and accidents, are caused by distracted operators (company IT17).

There are some other examples in which the manager or the worker were the victims of accidents, as in the cases of an OM and a worker from two different companies in the construction sector, who fell from the second floor of a building and from a ladder while working respectively.

There are also employers whose strategies do not put OSH in a prominent position. This can be for different reasons, for instance if the OM considers the type of activity to be risk free, such as in the case of a showroom or coffee bar; or if there has been a long period without any type of accident. An example of the latter is demonstrated by the case of a company from the manufacturing sector (company IT06). According to its OM, the absence of accidents is because, after years of work, workers have finally understood what the sources of danger are and what activities they should pay greater attention to. From 1963 until today, there have been about 60 accidents. All of them were minor injuries that entailed a few days away from work. They were mostly the result of falls, slips, hand cuts and wounds with needles of looms. The only severe accident was that of an off-site worker, who had a motorcycle accident on his way to work that led to considerable immediate legal and financial consequences for the company. The OM considered this situation as wrong and decided to sue the insurance company, as the worker was innocent in the accident. He won the case against the insurance company and was reimbursed for the entire amount paid.

Many of the risks presented in the previous section have been reduced by means of internal rules, procedures and operating instructions defined in cooperation with and with the agreement of the workers. In one example, in a company that produces automotive special spare parts and braking systems, the management's awareness reduced physical efforts because it decided to maximise automation introducing Numerical Control (NC) machines.

For some managers, defining internal rules is difficult because most of the activities of the sectors analysed are essentially artisanal and changing the ways in which workers do their jobs is complicated.

It can be inferred from the findings that the awareness of risks and the capability of taking proper countermeasures are correlated with the industry sectors, the size of the establishments and the characteristics of the OM. In most cases, the best ways of managing OSH have been taken in the manufacturing sector and in companies with more than 20 employees, in which, for example, a specific OSH budget could be allocated, and the working conditions seem to be better overall.

In fact, in four out of nine companies that employ 10-19 employees, plus one in each of the other size classes, there is an allocated OSH budget; the larger the establishment is, the higher the OSH budget. In order to provide a rough order of magnitude from this observation, a micro-sized company in the wholesale and retail sector has an annual OSH budget of about EUR 2,000. In a manufacturing company with 11 employees, the budget is EUR 20,000 for the annual updating of tools and machines that are subject to obsolescence. Finally, in a company from the manufacturing sector employing 20-49 employees, the budget may reach up to EUR 300,000, or in a transport company employing 10-19 employees, the annual budget for additional safety courses is EUR 15,000. In general, these amounts of money allow for upgrading equipment, purchasing or substituting tools, safety mechanisms, PPE, maintenance, external advisors, fire extinguishers, safety courses for employees, signage and autonomous solutions and interventions. For the companies with no OSH budget, there are some companies in which the OM simply does not think about investments in safety measures and some in which OSH investments are made only in relation to needs. Recurring anecdotal statements in relation to the latter include: *'According to what you must do, you do not mind the cost'* (company IT21) and *'With respect to what is to be done, there are costs and investments'* (company IT01).

3.2.1 Practices of acquiring OSH knowledge

Only one company (IT17) reports having 'good knowledge' of what is required according to regulations. Two companies (IT03 and IT19) report having 'moderate knowledge'. These three companies proactively acquire knowledge from multiple sources, including from advisors; employers' associations; the wise use of sector-specific certificates, which (almost always) require the implementation of a management system (namely companies IT17 and IT19); attending courses; web sources; and magazines.

As for the rest of the companies interviewed, the existing level of knowledge seems insufficient; therefore, these companies are not good examples to take into consideration.

As a general remark, it should be noted that there is widespread use of external advisory companies for acquiring OSH knowledge, both explicitly (that is, for asking specific questions) and implicitly (that is, as a result of asking specific questions). Unfortunately, it seems that there is no actual 'learning' gained from these advisors.

3.2.2 Risk analysis practice

As mentioned, there is widespread use of external advisory companies for carrying out risk assessments. Only four cases were identified in which no risk evaluation was carried out at all (namely companies IT14, IT16, IT20 and IT22). In the cases studied, risk assessment results in a number of practices, rules and routines being put into writing by different corporate figures: the RSPP, the OM, the external advisors, the practitioner or a delegated employee (the RLS). Not all of these persons are always present and, in general, the written nature of this documentation is as a result more of the obligation for this documentation to be produced than of a formal and structured way of managing safety (that is, managers typically do not produce formal documents proactively). The only exceptions (reported below) are from one company in the manufacturing sector and two companies in the construction sector where a deeper and more comprehensive description of risk assessment in the workplace was apparent:

- In the first case (company IT01), risk assessments are carried out internally except for cases when a more detailed analysis and the assistance of an external firm are needed. The risk analysis is performed at all levels of the production process, from the arrival of the machine components, to the assembly, testing and cleaning up, to packaging and shipping. There is also a periodic evaluation of near-misses, plus a visit by the occupational practitioner four or five times a year. If a rule or a standard is modified, the situation is analysed according to the updated rules/standards. Those in charge of risk assessment are the RSPP, the external advisory company and the occupational practitioner.
- In the second case (company IT10), company risk assessments are carried out and documented by a team of employees, chosen on the basis of the specific (technical) needs; the planning of the activities is performed by the employee formally responsible for risk assessment.

- In the last case (company IT11), rules are written in a risk assessment document (DUVRI), which contains all the instructions on how to perform tasks safely. This document is prepared and implemented according to the specific nature of each job. The workers' representative is involved in this process and the workers share the rules and are more likely to follow them, as they have been established by them. An operating safety plan (POS) is received from the customer, which feeds into the DUVRI. Although the company strives for uniform working procedures, work is carried out at many different sites with other processes simultaneously. It is therefore necessary to perform a new risk assessment every time a new job is started, but this also enables the company to gain a lot of experience, which improves safety. The risk assessment is carried out by the internal technical manager, who can receive support from external advisors if necessary. The manager stated that he prepares the document and delivers it to the workers before a job, but that he is not aware of the specific details of its contents, but has only a general understanding of its contents. In the opinion of the manager, risk assessment is an advantage that constitutes added value in terms of preventing injuries and cost savings.

However, there are some other cases in which the OM was not able to give any information about the content of the risk analysis documentation or the legislative requirements or even about safe working practices, even though the OM assessed his or her level of risk knowledge to be relatively good. This applies to the case of company IT15, in which OHSAS 18001 is in place, and risk analysis practice should also be in place.

3.2.3 Risk communication practice

Communication in our case companies is rather informal and happens routinely, especially in the micro-sized companies. The main topics of discussion tend to be operational issues and business. OSH communication happens very rarely, with a few exceptions. In the manufacturing sector and in relatively large companies, communication tends to be more formal and in written form. This is the case in two companies from the manufacturing sector with more than 20 employees. In these companies, there is written documentation of risk assessment, and this documentation is shared with the workers by means of an annex containing the defined rules and the emergency plan. The OMs and the workers are familiar with the content of the written documentation and risk assessment is used as an effective instrument for managing OSH. One of the OMs said:

'We do not do it only for legal protection, but also, and above all, as a matter of common sense and for the safety of the workers' (company IT01).

The operating instructions are on paper and signage is present in the plants.

Operational standards for some operations are defined with input from the workers. This is symptomatic of a participative approach. The OM ensures that workers agree with any safety measures and management decisions in general. In one of these companies, a process to evaluate near-misses already exists, while in the other the OM stated that recently there was a meeting in which they considered introducing the evaluation of near-misses as a new safety practice of the company.

In the micro size class, communication within the company is oral and informal. Often, there are brief meetings at the end of a shift or at the end of a working day, but they are not about safety issues. The daily meetings between the manager and the workforce could be a good opportunity to set internal rules and standards to improve the general situation of the company from the safety point of view. Other communication tools include signage, bulletin boards, intranet posts, posters and signs on the ground in the production areas.

3.2.4 Routines ensuring safe and healthy working

In addition to the risk analysis and communication routines described above, many of the case companies have additional routines as a consequence of at least a partial implementation of a management system, which ensures a better attitude towards processes, and therefore safer and healthier working.

In addition to these, safe routines are typically embedded into ordinary work routines and are linked to specific tasks.

3.2.5 Use of external OSH expertise

As mentioned earlier, the use of external OSH expertise is very frequent in Italy. Regular (that is, systematically used over time, contractually agreed and often with legal responsibility as an external RSPP) support from advisors is reported in 14 out of the 22 cases: by all of the manufacturing companies, through temporary support, two construction companies (IT11 and IT12, through long-term contracts), one HORECA company (IT15, through long-term contracts), all of the transporting and storage sector companies, through temporary support), and one wholesale and retail company (IT21,through temporary support).

The temporary support typically includes technical advice on risk identification and analysis, as well as 'temporary' events (such as the application of a specific OSH programme), while the long-term contracts very often include legal responsibility as an external RSPP.

3.2.6 Motivation of company OSH practice

Through describing what influences OMs in their reasoning around why they should care about OSH aspects in their companies, a classification of the principal motivations can be made.

These motivations, as listed in the interview guide, are categorised as follows:

- legislative compliance;
- customers' requests;
- suppliers' requests;
- concern about inspections from authorities;
- workers' safety;
- impact on insurance premiums;
- competitive advantage in placing orders;
- being a 'good' employer;
- pressure from trade unions;
- corporate reputation.

More than two-thirds of the case companies reported legislative compliance as the main reasons that motivates their OMs to deal with safety, while worker's safety is in second place, with 13 preferences. Next, there are concerns about inspection from authorities (nine cases). This category has a huge presence in the construction and HORECA sectors. In five cases, the main motivation is customers' requests. This happens in the manufacturing sector for those companies that have specialised in operating in niche markets. Suppliers' requests and pressures from trade unions have never been mentioned in the sample. Two OMs (one from each of the manufacturing sector and the transporting and storage sector) consider corporate reputation and the competitive advantage in placing orders when dealing with safety issues important. Being a 'good employer' is one of the reasons that made the OM of a construction company take safety measures within his company. A manager of a car body shop considered insurance premiums important. The OM stated that he had saved money on the premium due to INAIL through the provision of safety courses. Indeed, this allowed his firm to receive the 'flexibility for prevention' discount offered to companies that run operations for the improvement of health and safety in the workplace for at least 2 years, in addition to those stipulated by legislation (Decree 81/2008, and amendments).

3.2.7 Workers' participation in the practice of OSH risk prevention

The person appointed as the RSPP is present in every company. This role, the tasks of which are related to safety in the company, is mandatory and implies the significant participation of (at least) one worker (Legislative Decree 81/2008). However, it is very seldom that further ways of participation/representation

are established within this type of company. In fact, almost no work councils or OSH committees were found in the case companies, except in three cases, all from the manufacturing sector. Two of them, which belong to the larger size class, have both a work council and an OSH committee and there are two workers' representatives for safety (RLS) who, together with the health and safety manager, are elected by all unionised and non-unionised workers in the company. The RLS is also present in two of the larger small companies from the construction sector and the wholesale and retail sector. It seems that the presence of further forms of employee representation take place in companies where the number of employees is rather high. This is supported by the fact that during its 'best years' the remaining company in that samesize class employed about 50 shop floor workers and, despite historic layoffs leading to only 15 employees working there now, a certain level of unionisation has survived.

For smaller companies (5-9 employees and 10-19 employees), formal employment representation has barely developed. An anecdotal statement by an OM is: *'This company is very small, so relationships between the ownership and the workforce are very close. The contact with workers is daily and nearly constant'* (company IT05).

Regarding the low level of worker representation and unionisation in his company, the OM of a car body shop stated: *'When things go well, employees have no objections'* (company IT21).

The relatively low level of participation of workers in OSH is potentially related to the issue of (perceived) factual responsibility. According to the OMs interviewed, 16 out of 22 stated that they consider themselves to have a higher level of factual (that is, independently from obligations) responsibility than workers when it comes to OSH issues, whereas two assessed their level of factual responsibility as medium and three considered that the OM had a low level of factual responsibility. In 10 out of 22 cases, the OM considered that his or her employees had a high level of factual responsibility (please note that an OM may consider himself or herself and the employees equally responsible); in nine cases, the OM thought that workers have a medium level of factual responsibility, and in only two cases the OMs thought that the workers have no factual responsibility in the case of an accident in the workplace. In the remaining case company, the OM stated that he had no idea about who is (at least) mainly factually responsible for OSH in the firm, which is related to the general lack of consideration about safety in this company where safety issues are treated only superficially.

With regard to workers' opinions, nine out of 22 of the workers interviewed considered that their employers have the main responsibility in the case of an accident, whereas eight considered that the employer has a medium level of responsibility. In the remaining five cases, the employer was considered by the workers to have only a low level of responsibility. Out of 22 workers, 10 thought that workplace accidents were their own fault, 11 workers assigned themselves a medium level of responsibility and one worker stated he has a very low level of responsibility in cases of accidents.

Considering the OM's and workers' opinions in each establishment, overall, we observed that OMs tend to think that they have the main responsibility in cases of accidents, as they assign a higher or at least a similar degree of responsibility to themselves than to their employees. This circumstance is even more obvious if the size of the establishment is considered. In fact, managers are more aware of their legal role in the larger small companies. In only three cases is the opposite situation evident, in which the OM considers workers responsible for their own injuries and accidents.

The workers interviewed have an opposite point of view. Eight workers think that they have the same degree of responsibility as their managers. This situation is fostered in the smaller companies and in sectors such as the construction and wholesale and retail sectors. Five workers assigned their employers a higher level of responsibility. The remaining nine workers assigned the responsibility for an accident to themselves.

The underrepresentation of union members among the workers (interviewed) and the few cases of membership of professional associations as regards the OMs (interviewed) emphasise the shortage of a systematic contribution from these organisations to the development of working conditions and the improvement of the actual situation of MSEs.

A high union density can and frequently does co-exist with strong national economic growth and other measures of economic success, and with the avoidance of 'low road' strategies (that is, working long hours, keeping costs down, agreeing to even poorer sales conditions, squeezing employee conditions, accepting low personal income, versus 'high road' strategies: searching and finding niche markets, developing a stable customer base, maintaining a committed and loyal staff, adjusting to new conditions

with agility) among enterprises. Dialogue between social partners and efficiently implemented collective bargaining agreements also confer benefits to ensure stability between bargaining periods as trade unions accept responsibility for reducing strikes, and so on. It is well known that union density is positively related to firm size and, while there is no routine quantitative data covering small and micro firms in this respect, it is clear that union presence decreases as firm size decreases. The findings of this study confirm this situation.

An exception to this was apparent in a company from the transporting and storage sector. Over the past 2 years, there has been an increase in union enrolments (CGIL, Italian General Confederation of Labour). This is because a corporate contract was struck 2 years ago, making contracts at provincial level. As a result, the company got in touch with the unions, which intervened to stipulate ad hoc agreements for all companies that were part of this business contract. The relations with the unions are described by the OM as very good and, of the current 22 employees, 15 are members of the union.

3.2.8 Good OSH practice examples

Good OSH practice examples in the case companies were found at different levels, ranging from the organisational level to basic aspects. A short list of good practices from the interviews is reported in Table 6, in which references to the corresponding individual case companies can also be found. The effectiveness of those good practices is commented on briefly in the following paragraph.

Table 6 Good OSH practice examples

ER CODE	Case number	Sector	Good practice example
IT_C3_01	IT01	Manufacturing	Evaluation of near-misses; checklist by the RSPP and periodic meetings between the management and the workers to assess the progress of activities in general, although they do not only refer to safety; good safety climate
IT_C3_02	IT02	Manufacturing	Proactive attitude; strong focus on PPE and small technical interventions
IT_C2_03	IT03	Manufacturing	Considering inspections as useful in order to improve; proactive attitude in acquiring knowledge, from multiple sources
IT_C1_05	IT05	Manufacturing	Strong focus on skilled workforce
IT_C3_07	IT07	Manufacturing	Proactive and collaborative approach among OM, employees and advisors in order to continuously identify possible improvements; successful application of OSH programmes
IT_C2_08	IT08	Manufacturing	Excellent (general) managerial skills of the OM
IT_F3_03	IT11	Construction	Strong focus on skilled workforce
IT_H3_01	IT17	Transporting and storage	Strong focus on skilled workforce
IT_H3_02	IT18	Transporting and storage	Proactive attitude; strong focus on OSH training
IT_G1_01	IT19	Wholesale and retail	Relatively large OSH budget; (proactive) focus on legislation

3.2.9 Effectiveness of OSH management practice

Out of 22 case companies, nine were assessed by the research team to have a low level of risk control, seven to have a medium level of risk control and six to have a high level of risk control. The conclusion that a company had a low level of risk control was primarily based on a lack of a systematic approach

and documentation, as well as basic knowledge on specific and general OSH issues. All of the companies did have informal routines.

Based on the interviews and, specifically, the good OSH practice examples identified, it seems that a good, systematic, managerial approach (to OSH, but not limited to this) is effective for MSEs, even more than reactive moves after inspections/severe accidents.

3.2.10 Classification of company OSH strategy

Based on the information given in previous sections — to the extent that it is at all possible to talk about distinct OSH strategies — the case companies displayed an overall management strategy that can be characterised as ranging from 'reactive' to 'mainly proactive'.

Nearly half of the case companies (10 out of 22) were assessed by the research team to have a fully reactive strategy for OSH, which almost always resulted in a 'clear low road overall strategy'. By contrast, four companies out of 22 were found by the research team to have a mainly proactive strategy for OSH, which always resulted in a 'clear high road overall strategy'.

In terms of sectors, there is a strong trend within the construction, HORECA, and wholesale and retail sectors towards a mainly reactive approach, which is also highlighted by the absence of good OSH practice examples (as listed in Table 6). On the other hand, the balance is shifted towards proactivity in the manufacturing and transporting and storage sectors.

3.3 Mechanisms and determining factors

3.3.1 The role of legislation and sector-level regulation

Based on the information gathered in the interviews with OMs and safety representatives, the knowledge (in terms of legislation, but also in terms of generic ergonomics provisions) of what is required by OSH regulation is generally acceptable; unfortunately, there are often not enough resources to effectively cope with OSH (of course, with a number of exceptions), both in terms of safety level and compliance with regulation. It seems that, in these cases, only a severe accident may suddenly force the companies to gain a better grasp of the legislation (and, as a consequence, to raise the safety level and comply with regulation).

Companies in all the sectors, but especially in the HORECA, transporting and storage, and construction sectors, are much more aware of the sector-specific rules than of non sector-specific rules. These rules were almost always explicitly referred to and adhered to in the companies in these sectors, even if (in the case of the construction and HORECA sectors) only at a 'pure compliance' level (that is, just to comply with regulation and not for real improvements in safety conditions).

Overall, the companies included in this study give the impression that OSH legislation is something 'optional'. Although for some companies OSH is very important, and they are clearly focusing their efforts on improving the OSH situation, for others, OSH is regarded as completely unnecessary for the running of a good business. In more than a few cases, customer requirements push OSH efforts beyond those required by legislation.

3.3.2 The role of support from authorities and from external service providers

Even though the Italian labour inspectorate seems to put much effort into inspections, the number of inspections reported in the interviews is still relatively low. As a consequence, only a limited number of companies can positively react to this input from the local authorities (for example company IT03). In general terms, from the interviews, the inspections do not seem to have a deep effect on the companies' organisations (that is, no company having experienced an inspection has mentioned significant changes regarding its organisation); of course, the role of inspections may be dramatically different in companies that are characterised by very poor levels of OSH, for which an inspection may suddenly push OSH standards towards an acceptable level.

In addition to the labour inspectorate, there are other authorities that play important roles in OSH, typically involved in the HORECA (for food safety reasons) and construction (because of the typically very high severity of accidents) sectors.

3.3.3 Value chain effects on company OSH management

For many firms — as told by their OMs — regardless of the size class or sector, the value chain effect of OSH decisions on business is very low. The companies are therefore free to define their own operational strategies. The resulting consideration is that the level of decision latitude is high for many of them, but this circumstance does not result in a particular attention to safety conditions and good OSH practices within the establishments. The high level of decision latitude does not lead to an active behaviour in relation to safety, but rather to a passive attitude towards the norms and standards; this inevitably results in poor OSH conditions and high levels of risks for workers.

However, outliers have been found. Companies from the manufacturing sector and the transporting and storage sector, having specialised in particular activities and found new opportunities in niche markets, frequently have a low level of decision latitude towards their larger and/or more powerful clients. Nevertheless, they have found ways to use this power relationship in their favour, as in the case of a company from the manufacturing sector. The OM of that company affirmed that:

'Customers take safety into account when commissioning a job. This prompts the company to be very careful in the management of health and safety in the workplace' (company IT02).

In fact, the same OM said about one of their larger clients:

'Customers like (multinational company) are demanding, and they want a work environment in which health and safety rules are respected' (company IT02).

This situation has led to the refurbishment of the floor (synthetic resin floor) in the production area of the establishment.

In the transporting and storage sector, the value chain's effect on the company's OSH strategy is quite high. For examples construction companies as clients of transporting and storage companies request all the necessary documentation and take proper precautions when a vehicle enters the construction site. This has an influence on company safety management and is seen as an opportunity to go beyond the law, tackling some good initiatives, for example additional training courses, such as working at heights and transport of dangerous goods. Moreover, one of the two OMs in this sector stated:

'Customers can influence the way of managing safety in so far as the goods they require are or not of a particular nature. For example, hazardous substances, waste or food. In these cases, we thought we needed a better training and, therefore, we arranged new additional courses about these issues' (company IT17).

Although — under certain circumstances — supply chain relations have the potential to act as determinants of good practice among enterprises such as small and micro firms that are in economically dependent positions, in the main they contribute to poor OSH practices and outcomes in these enterprises. This is the case for three out of four companies in the HORECA sector. In fact, in these three companies, the OM does not worry about OSH, and considers that the occurrence of minor injuries (rather than severe accidents) is due to the type of activity, which is low risk, and not too difficult to manage. The only exception was that of a company operating a catering service within a hospital unit. The manager stated:

'*The social and health food service is particularly delicate because the nutrition is an integral factor of therapy. The company, for each operational reality, provides a personalised management system that meets the customer's specific requirements'* (company IT15).

Considering the customers, the same OM also stated:

'Our clients include the so-called 'sensitive categories' such as children and hospital patients. The safety standards we apply are the most restrictive limits imposed to provide the high-risk categories absolute authenticity and safety guarantees. Therefore, we draft a document about the main initiatives and

programmes in this sense and this document is communicated to customers at every update' (company IT15).

The OM of a company from the manufacturing sector described the company's customers as demanding people, especially regarding entry procedures for materials used in their plants. One example of this was given by the OM himself when considering one of his company's most important customers. He stated that this client required that the behaviour of workers during loading operations adhered to strict safety requirements. These requirements were successful in improving safety and this is now the approach they have adopted for all of their customers.

In conclusion, customers in the manufacturing, transporting and storage, and HORECA sectors have more influence on company safety management than in the others (construction, wholesale and retail).

3.3.4 The role of management style and social relations

A general observation is that workers' personal experiences over years in their company can be clustered into two groups. The larger group is that of 'very good' experiences, in which the OM is depicted as a careful person who pays particular attention to OSH conditions. Confirming this assertion, a worker from the manufacturing sector highlighted the willingness of corporate management in relation to safety:

'A year ago, we were able to receive middle school classes for an OSH-related activity organised by Confindustria (the main organisation representing Italian manufacturing and services) *and this is a safety index!'* (company IT01).

When asked about the working climate in his company, a worker from the construction sector answered:

'The owner is very open with us. He is not the classic "boss", but speaks quietly and leaves a lot of decision autonomy in decisions to his workers. He is always very protective of the workers' (company IT10).

The second group is characterised by good experiences too, but for different reasons. In fact, as was often identified in the HORECA sector, workers (in the case companies in this study, a canteen chef, the brother of the OM and the quality manager) often have the chance to express their opinions. However, this situation seems to be the result of the worker holding an important role in the company or to the degree of kinship the worker has with the OM. This was also found in the manufacturing sector, where one employee said:

'I consider the owner as a friend and we adopt a reserved behaviour with other colleagues, because this is the best way of managing labour relations. I would emphasise, indeed, that there have never been opportunities for workers to be at odds with each other or with the management' (company IT07).

Other reasons given for good work experiences include close relationships with colleagues:

'As far as I'm concerned, the situation is very good. The relationship with the owner is good as well as with my colleagues. In the construction site or in dwellings, we work as a team and everybody knows each other's strengths and flaws' (company IT12).

There are, however, criticisms, especially in the HORECA sector, where the workers interviewed complained about excessive working hours and fatigue after a long working day. One of them expressed his unease:

'The job is becoming too hard for me … but soon I will become eligible to get a pension' (company IT15).

3.3.5 Other factors and the possible interplay of factors

The overall economic situation certainly has a strong impact on the variables under consideration in this study, typically worsening the average OSH level among companies (fewer resources than usual) when the local, national or global economic situation worsens. Many interviewees explicitly referred to the economic situation as a trigger for significant recent changes.

In the perception of the interviewers, good managerial skills seems to have a very significant impact in 'familiar' contexts such as MSEs, which is strongly connected to the age of the OM (and their managerial

styles); only six OMs are younger than 41; 11 of them are over 50. Age is also associated with IT-related problems, which may hinder companies from getting support through advanced (yet free) tools.

Finally, even though in the view of the interviewers company size and geographical location may have a certain impact, at least when it comes to the size of the company, the observations are counterintuitive. Having a very small number of employees may apparently enable informal well-functioning worker participation and dissemination of information, that is, overall, rather good risk control; nonetheless, taking into consideration the seven case companies with up to 10 employees, the level of risk control assessed by the interviewers was poor in six of these cases, and the overall strategy was assessed as 'low road' in five cases.

A relevant issue may be the differences between the three size classes. This issue deserves further consideration.

It was found that, most likely, the greatest differences remain between companies with up to 19 employees (that is, size classes 5-9 and 10-19) and companies with 20-49 employees. This observation may be not only a 'size' issue, but also potentially associated with matters such as OSH organisation and communication.

In companies belonging to the first two size classes (that is, 5-9 and 10-19), the OM maintains a close relationship with the workers. This relationship is fostered by the size of the firm and it leads to a situation in which the workers completely trust what they have been told by their employer. The established relationship between the OM and the workers is symbiotic. The workers, having full confidence in the OM, act following the directions of the latter without thinking about the reasons or considering the potential consequences of their actions or behaviours.

By contrast, when the number of employees increases, an intermediate corporate figure, such as a production manager, plant manager or supervisor, intervenes is involved and this separates the OM and the workforce.

This dissociation between OM and worker is a critical point, as it is almost exclusively bureaucratic and is not effective in relation to the organisation and communication of OSH-related matters. It works well only when the whole organisation works in a good way, while in those cases where there are already other problems, separating OMs and workers becomes an additional factor of instability.

3.4 Summary — what works and why?

As a general rule, companies rarely receive external OSH support from public organisations. The main sources of information are the external advisory companies commissioned to carry out the risk assessment and, in a small number of cases, other types of intermediaries.

Within the study, there were only six cases in which the OM was a member of a professional association. These cases are described below and some conclusions have been drawn.

The first case is that of an OM of a coffee shop in a town in the south of Italy (HORECA sector). He is a member of the CCIAA , which is an Italian body representing companies engaged in trade, tourism and services (tertiary sector), bringing together more than 700,000 businesses. However, his company does not receive any financial support from the CCIAA.

The second case is a micro firm in the construction sector. The OM is a member of ANCE-AIES Salerno, a national professional association in the construction industry, at the local level. Here too, there is no support from this association with regard to OSH.

The third case concerns an OM of a manufacturing company who was a relevant figure in API Lecco, a SME association in Lombardia (in the northern region of Italy), until a few years before the interview. The company is a member of both API Lecco and of UNIVA (an industrial union at local level), and OSH knowledge is acquired through these associations. The fourth case (also in the manufacturing sector) is a larger small company whose OM is a member of API Lecco. The role of API Lecco is to support this type of enterprise by, among other things, organising safety courses for managers and workers. This organisation is highly regarded among these businesses and its contribution in terms of contacting enterprises was fundamental.

The last two cases relate to the OMs of companies in the transport sector. The first has been Vice President of the Italian Federation of Transporters for the last 8 years. He is also a member of the Conftransporto committee, which is the confederation that combines all areas of transport (sea, rail and road) and adheres to Confcommercio (Italian General Confederation of Enterprises, Professions and Self-Employment). Because of these roles, the OM has taken part in a variety of training courses in the area of health and safety at work. The second is President of Transporters in Varese, a town in northern Italy; she is also at the highest levels of UNITAI (Union of Italian Vehicle and Transport Companies, founded 4 May 1957, and whose objective is to protect the trucking companies of goods on behalf of third parties).

After a preliminary analysis, taking into account the limited number of cases in the study, it can be stated that the importance of public organisations and professional associations is higher for enterprises in the north of Italy as regards support for safety issues than in the south of the country. Furthermore, safety courses organised by associations such as API Lecco are more appreciated by companies that show a greater awareness of OSH issues and the implementation of proper countermeasures. In fact, in the cases of companies not associated with any public organisation, safety courses are not conducted by authorities but are carried out solely by private companies; this is another obstacle for MSEs, taking their generally poor financial situation into consideration.

Support from insurance companies has been pointed out very frequently; among those, INAIL deserves a special mention.

Again, in terms of possible mechanisms, 10 out of 22 companies applied to a call from INAIL. Among them, seven companies won the tender issued by INAIL and benefited from subsidies. The remaining three companies were not successful in the tender to secure funding. The HORECA sector has never been a sector of interest in INAIL's tenders and that is why none of the companies analysed from this sector has ever considered participating in a call.

The most striking example of the importance of subsidies from INAIL is the case of a manufacturing company located in a town in northern Italy that had two warehouses for rent, the cost of which was considered too high given that the company's financial situation after the economic crisis was worse than before. Winning the call issued by INAIL helped the company to make the decision to adopt an automated warehouse system to replace the old warehouses. As well as removing the cost of the rent of the two old warehouses, there were also other benefits, such as a reduction in the time of order preparation and the better identification of materials. However, the main result to emerge was an improvement in ergonomic conditions because of the elimination of physical efforts in the manual handling of loads. The OM stated that contributions from INAIL played an important role in making the decision to install the new automated warehouse.

Moreover, a transport company and its OM have an agreement with INAIL for the operation of some courses about safety training.

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European Agency for Safety and Health at Work

Santiago de Compostela 12, 5th floor
48003 Bilbao, Spain
Tel. +34 944358400
Fax +34 944358401
E-mail: information@osha.europa.eu

http://osha.europa.eu

Publications Office