

Safety and health in micro and small enterprises in the EU: from policy to practice

Description of good examples

Table of contents

1	Introduction	6
2	Methodology	6
3	Results	7
4	Good examples.....	10
4.1	Orchestrated examples built on multi-dimensional strategies	10
	▪ Example 1. Prevention packages - economic support for improvement of OSH in MSEs - Denmark	11
	▪ Example 2. A programme for road transport and restaurants using OiRA — Online Interactive Risk Assessment - France	20
	▪ Example 3: Safe Forestry — a combination of activities to improve safety in forestry - Sweden	27
	▪ Good example 4. Weld Right (SvetsaRätt) — a web platform for improving OSH and OSH management in welding - Sweden.....	34
	▪ Good example 5. - Network activities and instruments in the construction sector — Initiative for a New Quality of Work's (INQA) 'Advance Good Construction' and its instruments (Check-Bauen, BauWertInWest) - Germany	39
	▪ Good example 6 - A broad programme aimed at improving safety and health in small construction companies - France.....	46
4.2	Get MSEs aware of, interested in and working with OSH	50
	▪ Good example 7. Labour Inspection Diploma as an incentive for micro companies to work with OSH - Poland.....	51
	▪ Good example 8. - Best Workplace Practices Award for interest in OSH and for providing solutions to specific problems - Estonia.....	57
	▪ Good example 9. Health Calendar ('Tervisekalender') to help employers develop healthy lifestyles and a positive safety culture, as well as to ensure employees' well-being at work - Estonia.....	65
	▪ Good example 10. 'Safety and Health in SMEs' — a campaign that aims to increase OSH awareness and initiate OSH improvements - Romania.....	69
	▪ Good example 11. Information and awareness campaign on changes entailed by the provisions of the EU Regulation on classification, labelling and packaging of chemicals - Romania.....	73
4.3	Strengthening OSH infrastructure through structures for providing personal OSH support to MSEs.....	78
	▪ Good example 12. BAMBUS — The Safety and Health Preventive Service Bus for the Construction Sector - Denmark	79
	▪ Good example 13. Regional safety representatives — OSH actors supporting workers and employers in Swedish MSEs - Sweden.....	86
	▪ Good example 14. OSH advisors in the construction sector disseminating OSH knowledge and supporting construction companies, mainly MSEs - Sweden	94
	▪ Good example 15. Consultancy service in OSH and face-to-face consultancy on site to increase employers' OSH knowledge and to support OSH management - Estonia	100
4.4	Non-OSH intermediaries engaging in OSH.....	107
	▪ Good example 16. National programme: OSH training for agriculture advisors. OSH information days for agriculture in different regions of Estonia - Estonia	108

▪	Good example 17. The Health and Safety Executive’s Estates Excellence Initiative – United Kingdom	112
▪	Good example 18. The General Pharmaceutical Council as an OSH support for pharmacies - United Kingdom	118
▪	Good example 19. The Care Quality Commission — impact on OSH in small companies in the care sector - United Kingdom	124
4.5	Using requirements from the value chain as a lever for OSH	130
▪	Good example 20. VCA — ensuring safety for subcontracting companies carrying out work in high-risk industries - Netherlands and Belgium	131
▪	Good example 21. The Olympic Park Legacy – United Kingdom	139
▪	Good example 22. Compulsory OSH courses and identity cards to provide and control basic OSH knowledge in the construction sector - Sweden	145
4.6	OSH training for MSEs and their employees.....	150
▪	Good example 23. National programme: a comprehensive OSH training programme for safety managers and senior managers of SMEs - Estonia	151
▪	Transferability of the results.....	156
▪	Good example 24. Subsidies for companies — free training courses for the staff in charge of safety in SMEs - Italy	158
▪	Good example 25. OSH training for the construction industry in combination with OSH support for workplaces - Italy.....	161
▪	Good example 26. Safety and health at work — a prerequisite for competitiveness. Regional seminars in the Horeca and construction sectors - Romania	168
▪	Good example 27. ‘Safe in the store’ — a widely used web course about OSH in retail - Sweden	173
▪	Good example 28. ‘Synergie’ — OSH introduction for the newly employed - France.....	177
▪	Good example 29. Access — a project for free professional and OSH training of cleaning workers - Romania	186
4.7	Economic support for OSH improvements	191
▪	Good example 30. ISI-INAIL — incentives to companies for the implementation of interventions relating to health and safety at work - Italy	192
4.8	Provision of tools and methods suited to the support of OSH and OSH management in MSEs.....	198
▪	Good example 31. Occupational safety management system in the construction industry (AMS BAU) - Germany	199
▪	Good example 32. GDA Orga Check and INQA tools — self-evaluation checklists for small companies - Germany	207
▪	Good example 33. SOBANE and the Déparis guide — tools to support participatory risk management - Belgium	214
▪	Good example 34. Checklists for sectors — support in risk identification, selection of control measures and making an action plan - Sweden.....	219
▪	Good example 35. OiRA —sector-specific Online interactive Risk Assessment for SMEs - Belgium	229
▪	Good example 36. Ireland’s BeSmart.ie initiative — OSH tools for MSEs in many sectors- Ireland	234
▪	Good example 37. ‘Health and safety at work’ guidance for understanding OSH legislation - Romania	240

- Good example 38. A framework for cooperation within sectors to stimulate, facilitate and share OSH management practices - the Netherlands..... 244
- Good example 39. A network that brings together experts to support small companies in Germany — INQA network ‘Offensive Mittelstand’ (Advance SMEs) - Germany 249
- Good example 40. Knipperlichten — a tool for indicators for psychosocial risks at work - Belgium 256
- Good example 41. A tool for the risk assessment and risk management of work-related stress - Italy..... 261
- Good example 42. ‘Mavimplant’ — a tool supporting the good design of workplaces - France..... 268
- 4.9 Methods for authorities’ supervision adapted to MSEs 274
 - Good example 43. OSH labour inspections adjusted for MSEs - Denmark..... 275
 - Good example 44. Coordination between Danish public authorities when inspecting MSEs - Denmark 278

▪ **Good example 30. ISI-INAIL — incentives to companies for the implementation of interventions relating to health and safety at work - Italy**

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▪ **Background**

Given that a significant lack of resources for necessary investments is often observed to restrain MSEs from improving OSH, among other things, prevention tools have been made available to companies by INAIL — the Italian workers' compensation authority — and financial support (in Italian, ISI – Incentivi di Sostegno alle Imprese) has been activated for the realisation of projects aimed at reducing accidents and occupational diseases as well as for the implementation of safety and health interventions in the workplace.

The non-repayable grants are assigned subject to availability, according to the chronological order of arrival of the applications. The contribution, equivalent to 65 % of the investment, up to a maximum of EUR 130,000, is dispensed if the technical and the administrative audit/controls after the implementation of the project are successfully passed.

Each year since 2010, INAIL has published the public notice 'Incentives to companies for the implementation of interventions relating to health and safety at workplace' that reports ISI-INAIL project's facts (i.e. a website that encompasses both objective data associated with past years and the current call for application, which also invites MSEs to apply for funding).

In addition to the INAIL contribution, a small (unspecified) amount of funding is provided by the Ministry of Labour and Social Policy contributions. Both contributions vary in amount from year to year. According to figures available online, the total funding allocated by INAIL to the ISI-INAIL project is about EUR 1.2 billion since 2010. Although financial support is available for every business size, this programme was designed to favour mainly MSEs.

▪ **Target groups**

The beneficiaries of financial support are businesses and some self-employed individuals, having duly paid the registration fee of the Chamber of Commerce, Industry, Craft and Agriculture (CCIAA), in the whole country. The target group is not only MSEs, encompassing all enterprises, yet favouring smaller ones.

Funding is provided, within the limits for the various companies operating in different sectors, in compliance with 'de minimis' European law. According to the conditions of community legislation on the application of Articles 107 and 108 of the 'de minimis' treaty, the funding is allocated with the limits for the different companies during three financial years as follows:

- EUR 100,000 to companies relating to road transport sector. Regulation (EU) No 1407/2013;
- EUR 15,000 to companies active in the agriculture sector. Regulation (EU) No 1408/2013;
- EUR 30,000 to companies active in the fisheries and aquaculture sector. Regulation (EU) No 717/2014;
- EUR 200,000 for the others. Regulation (EU) No 1407/2013.

In order to give a quantitative view of access to the support for MSEs compared with large companies, Table 30.1 attributes scores to companies based on company size (the minimum score to be achieved to have access to the financing is 120 points).

Table 30.1 Access to support for MSEs compared with large companies

Company size (No employees including the employer)	Turnover in millions €/year	Score: if revenue exceeds the limits specified, the score is multiplied by 0.6
1-10	≤ 2	45
11-15	≤ 10	40
16-20	≤ 10	35
21-30	≤ 10	30
31-50	≤ 10	25
51-100	≤ 50	20
101-150	≤ 50	17
151-200	≤ 50	14
201-250	≤ 50	12
251-500		9
≥ 500		7

In parallel with the scores calculated on the basis of company size, a similar table is drafted by the same notice concerning the scores calculated on the basis of the standard premium (the premium is the amount of money that a business must pay for insurance) — at a national level — related to the business process involved in the project. The premium is a technical classification of processes each linked to the national premium average corresponding to own risk, and allows businesses to distribute the costs of insurance management according to a criterion of ‘solidarity’ between the different productive sectors. The higher the premium related to the business processes involved by the project, the greater the associated score will be. It is evident that, in allocating points towards the minimum score of 120 points, the policy published in the notice favours companies in higher-risk (more dangerous) sectors. However, unfortunately no statistical evidence exists that would confirm participation in the programme by companies operating in higher-risk sectors.

Among all the companies that exceed the threshold of 120 points, only a small ‘lucky’ portion of them have access to the funding. This situation occurs on account of the delivery mode of the contribution online application form. Any company wishing to apply for the economic incentive has to submit the application, at the date and time previously set, in the fastest way possible. In fact, the check of the requirements is done according to the chronological order in which the applications are uploaded (typically, less than a few seconds are enough to fail). This fact may disadvantage less prepared companies, such as — typically — micro enterprises.

▪ Description of the good example

INAIL finances the expenditure incurred for projects to improve health and safety levels in the workplace. The beneficiaries of the incentives are enterprises or self-employed individuals associated with the CCIAA. More than EUR 276 million (EUR 276,269,986) were made available in 2015, of which more than EUR 45 million were made available in the Lombardy region. Funding is non-repayable and is assigned subject to availability, according to the score calculated on the basis of a list of parameters (reported below and discussed above). The incentive is equivalent to 65 % of the total investment, up

to a maximum of EUR 130,000 with a minimum of EUR 5,000. For companies with up to 50 employees that submit projects for the adoption of organisational models and social responsibility the minimum contribution limit of EUR 5,000 does not apply. For projects involving an incentive equal to or greater than EUR 30,000 this may require an advance payment of up to 50 % of the amount of the contribution.

Companies can submit only one project for each domestic production unit, concerning a single type from among those listed below (of course, each intervention must be related to OSH; the impact on OSH has to be fully explained in order to have the application funded):

- Investment projects:

1. changes of the work environment;
2. acquisition of machinery;
3. purchase of devices for carrying out activities in indoor environments;
4. purchase of permanent anchor installations;
5. installation, modification or adaptation of electrical installations.

- Projects for the adoption of organisational models and social responsibility:

1. adoption of an OSH management system at work (in Italian, SGSL) certified to BS OHSAS 18001:07 by certification bodies accredited for the specific sector at ACCREDIA or other;
2. adoption of a sectoral SGSL, provided by INAIL agreements;
3. adoption of a SGSL for the business of construction and civil engineering;
4. adoption of a CSR management system with an SA 8000 certificate;
5. social reporting mode certified by independent third party.

- Reclamation projects from asbestos-containing materials (in Italian, MCA).

1. removal and disposal of MCA plaster;
2. removal and disposal of MCA from means of transport;
3. removal and disposal of MCA from plants and equipment (ropes, insulation, insulation of steam pipes, exhaust ducts and so on);
4. removal and disposal of tiles and paving made of vinyl asbestos including any fillers and adhesives containing asbestos;
5. removal and disposal of MCA covers;
6. removal and disposal of boxes, flues, chimneys, walls, pipes or artefacts typically consist of asbestos cement.

In order to achieve the minimum eligibility threshold (120 points) for obtaining the public funding, some specific parameters (five in total), associated both to characteristics of the enterprise and to the project related to the application, have been specified. One of these parameters, with a higher weight than the others, is the 'business size' of the company, which is the value assigned in inverse proportion to the size of the company (as stated above, favouring projects submitted by small and especially micro enterprises).

The parameters that determine the score are:

- business size (as described above);
- national average premium for the risk of the work (as described above);
- adoption of best practices (additional bonus);
- shared projects with the social partners or informative project to workers' representative for safety (RLS) (additional bonus);
- type of intervention (additional bonus only for projects proposed by MSEs of specific sectors if interventions are related to specific risks, that is noise, burn, shear and cutting, fall);
- regional bonus (if any).

With regard to the procedure for submitting applications, INAIL makes use of the 'evaluation desk' procedure (Legislative Decree No 123/1998), better known as 'click-day', allowing a strong simplification that, as already mentioned, has a decisive influence on the outcome of the list of companies eligible for contribution.

Specifically, applications must be submitted via web, according to the following three phases:

1. access to the online procedure and filling out the application;
2. submission of the online application;
3. sending the documents to complete the application on time and in the required format.

Once the applications for funding are uploaded, INAIL proceeds with the evaluation and verification process, in order to check the full consistency of data and information provided. During the verification process, on-site inspections can take place. If any issue arises, INAIL can recalculate the score.

Regarding the dissemination and communication of the programme, INAIL promotes various information campaigns covering the entire national territory. These campaigns provide technical information, the timing of the initiatives and the main elements of the call, and promote and encourage a synergy of action between business productivity and worker protection with measures that allow virtuous companies to save economic resources. Moreover, INAIL promotes targeted meetings with associations of enterprises, consultants' associations and social partners. Finally, companies whose applications were positively assessed will also benefit from the assistance of the competent INAIL offices in the territory for the duration of the administrative procedure, from the stage of sending the documents to completion of the application.

▪ Results and evidence of impact

While the spread of this programme among MSEs is well proven (data are reported at the end of this section), the quantitative verification of the impact in the company coming from the implementation of projects is ongoing.

Recently, INAIL, as a result of research and data collection performed on companies that had implemented a project for the adoption of organisational models and social responsibility (OHSAS 18001), verified the raising of safety and health levels in such companies. This test was possible by means of a series of indicators among which, first of all, is the average injury rate. The indicator has shown a marked decrease in the average accident rate. The validity of this type of indicator can be considered realistically objective since such interventions involve the whole company's production system without leaving some industrial process not covered by the interventions itself, which could otherwise randomly influence (and also overestimate) the average accident rate. More issues in measuring the outcome were experienced when investment projects (mainly the purchase and installation of new machinery) were considered. In fact, as a dramatic example, by means of this type of financing, companies are forced to purchase machines compliant with the latest standards. Then, it is logical to deduce that the company may gain some safety benefits together with productivity benefits by purchasing a machine with special devices, technologically innovative and at the vanguard. However, thus far, there are no direct indicators of effectiveness for this type of project. This is mainly for two reasons. First of all, the limited observation time is not enough for a precise verification of results. In fact, no direct relationship can be observed between the replacement of the machinery and the occurrence of an accident in such a limited amount of time when other factors can randomly affect the results. In the second place, since the notice targets the different sectors with a series of interventions potentially very different from each other, the indicators of effectiveness cannot be easily standardised, but, on the contrary, their use should be diversified according to the type of intervention and for each individual sector of application. Summarising, today, INAIL uses indirect indicators that are objectively valid for companies that have implemented projects for the adoption of organisational models and social responsibility, and is working to pull out other indicators that can also be used in the evaluation of projects involving replacement or modification of existing machinery.

Many enterprises are participating. Based on data provided by INAIL, the number of SMEs has increased markedly between 2010 and 2015. The number of loans returned to small businesses is increasing. In 2014, MSEs accounted for 93 % of all enterprises that obtained funding. The percentage of MSEs admitted (out of all enterprises admitted each year) gradually increased from 45 % in 2010 to 61 % in 2014. From these data, it is clear that the programme has been successful.

Although this massive participation of MSEs cannot prove by itself the actual effectiveness of the programme in terms of health and safety conditions for the workers, this continuity allows an economic return because of lower spending by INAIL for compensation of damages (as a significant decrease in accidents occurred), together with a constant flow of information that can be useful for the development of future programmes. After all, the number of companies applying has been high every year and as a

matter of fact there were 80,000 applications in the period 2011-2014 and there were 23,000 just in 2015 (INAIL Regional Directorate of Lombardy — Technical Consulting Risk Assessment and Prevention, 24 October 2016, personal communication).

In addition, from the data in Table 30.1, the emphasis that INAIL places on trying to favour, through funding, smaller companies, is evident. The effects of this INAIL policy can be shown by the results of some surveys carried out by the institute itself. The results show that there is a very high percentage of applications submitted by companies with up to 10 employees. In particular, data collected by INAIL show that, in relation to the last ISI-INAIL Notice (2015), 80 % of applications came from companies with up to 20 employees and more than 50 % of applications came from companies with no more than 10 employees (INAIL, Regional Directorate of Lombardy — Technical Consulting Risk Assessment and Prevention, 24 October 2016, personal communication).

These programmes also show how high-level regulators (Ministry of Labour, INAIL) deploy an OSH management strategy at a lower level (that of an individual company). The overall programme, in fact, although maintaining a great degree of freedom that is helpful for the company, directs it towards certain types of actions and interventions rather than others. As a consequence, it may lead to greater involvement and alignment of all OSH bodies, from companies to the Labour Inspectorate and so on, which could ensure a good run in terms of improved health and safety conditions in the workplace. However, we only have indirect evidence of this impact. The most striking case of such a mechanism has to do with the third project type listed in the project in 2015, namely 'reclamation projects from asbestos-containing materials'. Indeed, while the first two types of implementable projects are the same from year to year (which is very useful for companies to plan their interventions over the years and to get used to this programme and its application in a smoother way), INAIL reserves the possibility of changing the third project type every year. This modus operandi could lead companies to focus their attention directly on this third type of intervention that, well addressed by INAIL, should for sure match very tightly the safety and health needs in the workplace in the current Italian context. In the end, companies (especially MSEs that, in fact, as a result of lack of resources, would probably never have invested in certain safety areas) are involved in projects that vary from year to year and are developed to counteract lack and/or absence in the safety and health field, context-wise (thanks to INAIL).

▪ Learning from weaknesses and failures

From an in-depth analysis, built on the basis of the opinions of individuals who have first-hand experience with the programme, weaknesses can be identified at INAIL level and at company level, and both result from the procedure whereby companies can try to apply the economic incentive.

INAIL Public Notices are accessible through the so-called 'application-on-line'. Checking whether applications meet the requirements is done according to the chronological order in which the applications were uploaded. This system, in theory, could exclude high preventive value projects in favour of lower preventive value projects if applications for the latter are sent earlier. In practice, only projects with a score of 120 points are considered, that is those projects that INAIL already evaluates with high preventive potential. If this procedure was not followed, INAIL would have to examine thousands and thousands of applications, resulting in great delays in financing disbursement (INAIL, Regional Directorate of Lombardy — Technical Consulting Risk Assessment and Prevention, 24 October 2016, personal communication). The evidence of this can be found in the 2015 call, when there were about 23,000 applications (i.e. a very high and not completely expected number) and INAIL suffered from delayed financing disbursement. From the point of view of the companies, the click-day is often described as a lottery that rewards faster electronic transmission lines instead of going into the details of the most deserving projects. A system of this kind is therefore considered by a number of companies as inappropriate, condemning companies that should instead be supported and facilitated to deal with bureaucratic requirements, and helped in accessing government grants for an important issue such as safety. Therefore, this aspect can be improved, but finding a solution is a matter of balancing the abovementioned aspects (INAIL, Regional Directorate of Lombardy — Technical Consulting Risk Assessment and Prevention, 24 October 2016, personal communication).

▪ Conclusions

The INAIL Public Notice lists the requirements for participation. Since there are a number of requirements that enterprises must meet to have access to incentives, this forces the companies to meet the criteria.

Dialogue and inspection are part of the process that the technical and administrative supervision put in place, forced to a coercive mechanism because companies are driven to/forced into some types of implementation, but also forced to a 'normative' mechanism because of the dialogue that comes with an OSH professional (e.g. an inspector). The latter visiting many different enterprises and the projects they are implementing disseminates the information collected, and such a mechanism leads the enterprise to 'behave similarly' and thus to follow the same standards.

The notice proposes a list of possible (as examples) eligible investments. This is an indirectly coercive mechanism because the company is actually pushed to implement only initiatives included in the call, but other OSH interventions are disregarded, even if they could bring better results.

MSEs suffer from reduced resource availability, and this reflects there being less time and personnel available to scout, apply and follow-up the calls for funding. The continuity and repetitiveness over time (since 2010) of this well-promoted programme significantly reduces the effort that should be devoted to finance OSH interventions, thus facilitating MSEs.

▪ Transferability of the results

This programme was designed to be applied to any sector, any business size, and any type of project (investment projects, organisational models, reclamation projects and so on). Thus, the applicability and success of this programme is taken for granted, as is the outcome in terms of number of applications (also after having considered the programme targeting on MSEs and more dangerous sectors). Nevertheless, results could vary depending on a number of factors (typically sector, business size, type of projects).

This kind of programme requires substantial financial resources over several years.

▪ References, key literature, web pages and sources

<https://www.inail.it/cs/internet/home.html>

<https://www.inail.it/cs/internet/attivita/prevenzione-e-sicurezza/agevolazioni-e-finanziamenti/incentivi-alle-imprese.html>

<https://www.inail.it/cs/internet/attivita/prevenzione-e-sicurezza/agevolazioni-e-finanziamenti/incentivi-alle-imprese/bando-isi-2015.html?id1=2443085356892 - anchor>

<https://www.inail.it/cs/internet/docs/isi-2015-presentazione.pdf?section=attivita>

The current overview has been compiled from web-based sources, strongly supplemented with additional information obtained through:

- an interview with the Director of INAIL, Regional Directorate of Lombardy — Technical Consulting Risk Assessment and Prevention, who also reviewed a preliminary programme description. The interview was held on 24 October 2016 in Milan and lasted about 30 minutes;
- personal communications with the Responsible of INAIL, Regional Directorate of Lombardy — Technical Consulting Risk Assessment and Prevention;
- an interview with a professional from a consultancy company in the area of Occupational Safety and Health, whose business is mainly focused on micro, small, and medium-sized enterprises.

The European Agency for Safety and Health at Work (EU-OSHA) contributes to making Europe a safer, healthier and more productive place to work. The Agency researches, develops, and distributes reliable, balanced, and impartial safety and health information and organises pan-European awareness raising campaigns. Set up by the European Union in 1994 and based in Bilbao, Spain, the Agency brings together representatives from the European Commission, Member State governments, employers' and workers' organisations, as well as leading experts in each of the EU Member States and beyond.

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