

From policy to practice: Safety and Health in Micro and Small Enterprises in the EU

European Risk Observatory

National Report: Sweden

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1 Description of the national context

Micro and small enterprises (MSEs) constitute a considerable share of Swedish enterprises and employ about 46 % of the workforce in the private sector. MSEs are affected by almost all occupational safety and health (OSH) legislation, with a few exemptions relating to the documentation of OSH management for establishments employing fewer than 10 people. In the regulation about systematic work environment management (*Arbetsmiljöverkets författningssamling AFS 2001:1*), three such exemptions are made. Companies with fewer than 10 employees need to fulfil the demands but they do not need to have written documentation as demanded for larger companies in § 5 (written work environment policy), § 6 (written documentation about distribution of OSH work tasks) and § 11 (documented annual follow-up of the OSH management). The demands relating to the quality of the working environment, for example regarding safety, noise and chemical exposure, are equal for MSEs and large companies.

1.1 Economic profiles of MSEs

As shown in Table 1, 99.4 % of Swedish enterprises are small and micro-establishments employing fewer than 50 people.

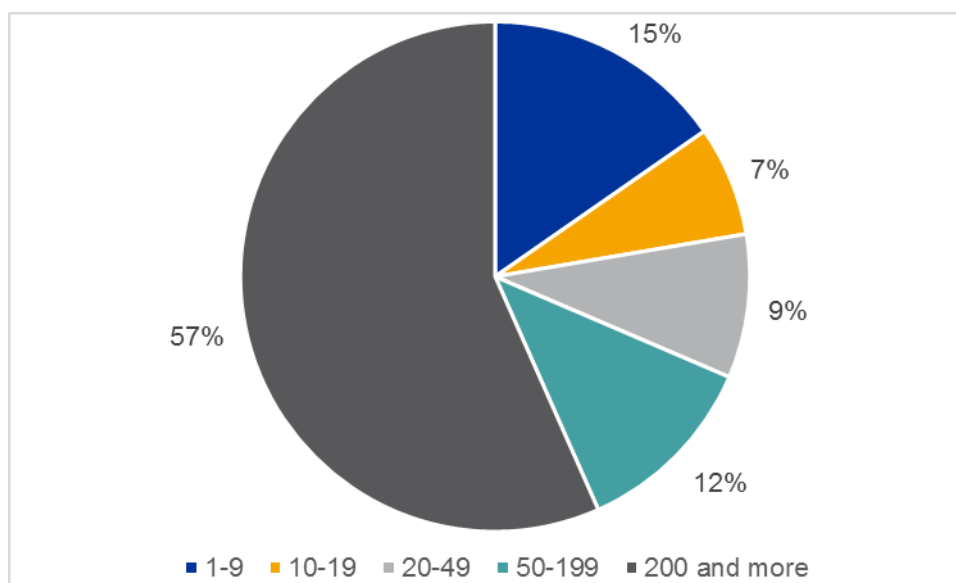
Table 1 Breakdown of establishments by size in Sweden, 2015

Type	Size (number of employees)	Percentage	Number
Sole proprietorship	0	73.81%	803,327
Micro	1-9	22.62%	246,132
Small	10-49	3.00%	32,641
Medium	50-249	0.48%	5,217
Large	≥ 250	0.09%	993
Total		100%	1,088,310

Source: SCB, 2016.

The number of small establishments in the private sector has increased during the last decade (SCB, n.d.), as an effect of the changes in strategy of large enterprises, outsourcing parts of their production and services. This outsourcing, with multiple networks of supply chains consisting of numerous micro- and small establishments, is changing their business structure.

The MSEs are major employers. As seen in Figure 1, large establishments with 200 or more employees employed 57 % of the workers in the private sector in Sweden in 2013. 31 % of the workers were employed in companies with fewer than 50 employees. Over the last 15 years, the share of workers employed in MSEs has increased (SCB, n.d.).

Figure 1 Share of employees by establishment size in Sweden, 2013


Source: SCB, n.d.

Table 2 shows the number of enterprises in different sectors (according to the Statistical Classification of Economic Activities in the European Community (NACE) one-digit level) and the distribution in different size classes. Most MSEs are found in the agricultural sector, which also covers fishing and forestry. This sector, however, engages few employees. One of the largest MSE sectors is professional, scientific and technical companies, which includes different kinds of professional service, for example law firms, architects, accountants and technical and scientific services, mainly employing white-collar workers, many of whom have a higher level of education (university) than the blue-collar workers.

Table 2 Number of Swedish enterprises by sector (1-digit-level, NACE), and distribution of MSEs by size, 2015

Sector	Number of enterprises	% of enterprises with			
		0 employee (self-employed)	1-9 employees	10-19 employees	20-49 employees
agriculture, forestry and fishing	250,058	95.37	4.39	0.18	0.05
Professional, scientific and technical	175,785	69.91	27.89	1.19	0.68
Trade; repair for motor vehicles and motorcycles	126,909	59.36	34.23	3.59	1.83
Construction	98,731	56.85	37.52	3.42	1.69
Real estate	86,980	83.24	15.71	0.53	0.32
Arts, entertainment and recreation	65,799	83.97	14.49	0.88	0.43
Other services	67,541	77.93	19.64	1.29	0.77
Information and communication	58,145	69.16	27.08	1.74	1.23
Manufacturing	51,745	58.72	29.37	5.29	3.83

Sector	Number of enterprises	% of enterprises with			
		0 employee (self-employed)	1-9 employees	10-19 employees	20-49 employees
Administrative and support service	37,662	63.69	29.53	3.26	2.12
Human health and social work	36,054	65.90	27.82	2.36	1.76
Hotels and restaurants	31,386	38.93	50.21	6.90	3.06
Transport and storage	28,979	46.46	43.82	5.17	2.91
Educational	27,167	74.92	18.25	3.00	2.33
Financial institutions and insurance	19,822	77.25	19.61	1.24	0.91
Electricity, gas, steam and hot water plants	4,225	87.46	7.46	1.18	1.89
Water works; sewage plants, waste-disposal plants	1,497	53.31	29.99	6.95	4.88
Mines and quarries	726	62.67	28.93	4.41	2.34

Source: SCB, n.d.

The statistics on reported occupational accidents by enterprise size are presented in Table 3 (see Appendix). However, these statistics are most probably biased, as it is well known that MSEs do not report all occupational injuries (EU-OSHA, 2016). Two Swedish studies confirm this. In agriculture and forestry, a study from 2006 shows that only around 10 % of occupational injuries are reported (Pinzke and Lundqvist, 2006) and in a study from 1987 about 50 % of the accidents were reported (Hansson, 1989).

1.2 Role of authorities, social partners, insurance companies and other stakeholders

The Swedish labour market is characterised by the strong and central role played by the social partners. Collective bipartite agreements between the social partners, mainly at sector level, decide employment conditions including wages. In addition there is also substantial local negotiation in the companies leading to local adaptations of the framework set in the collective agreements.

Regarding OSH, there is substantial national legislation, which also implements the EU directives on OSH. In addition to the legislation, the social partners may agree on complementary initiatives in order to support the implementation of the OSH legislation and respond to the need of members of the employers' organisations and trade unions.

The Ministry of Employment (*Arbetsmarknadsdepartementet*) decides about national strategies on occupational safety and health. The main demands on the working environment are described in the Swedish Work Environment Act and further regulated in the Work Environment Ordinance (*Arbetsmiljöförordningen*, AMF) issued by the government in 1977.

The Swedish Work Environment Authority (*Arbetsmiljöverket*, SWEA) is the administrative authority for questions relating to the work environment and working hours. SWEA is authorised to issue and enforce secondary regulations (provisions), which describe in more detail the work environment requirements

to be met. Among the provisions are generic provisions aimed at all workplaces regardless of sector, size or employer, as well as detailed provisions targeting specific industries, professions, tools, chemicals and biological agents. There are about 80 such detailed regulations issued by SWEA (by December 2016). However, there is ongoing work aiming at reducing the number of detailed regulations as well as the provisions in them.

The regionally organised Inspection Department of SWEA supervises the implementation of OSH regulations at company and organisation levels to ensure that the working environment meets the requirements set out in the OSH legislation. In 2015 about 21,000 inspections and other kinds of meetings at workplaces were carried out by the about 200 inspectors, although the number of inspectors has been much reduced over the past decade due to budgetary measures. However, the number of inspectors has increased and was about 250 in January 2017. The number of inspections has decreased and there were about 31,000 in 2013 (SWEA, 2015). The inspections check that the employer has an effective organisation for systematic work environment management (according to one of the most important generic provisions aimed at all workplaces, AFS 2001:1). The work environment is audited from a holistic perspective and should embrace physical, mental and social risks. In addition, special inspection campaigns may target particular hazards, such as a special type of machine, job or sector.

There are a number of other governmental bodies that may affect different aspects of the working life. For instance, the Ministry of Health and Social Affairs (*Socialdepartementet*) is responsible for social security legislation, sickness certification, work ability assessment, occupational injury insurance and pensions. The Swedish Chemicals Agency is responsible for regulations concerning chemical products, for example import, labelling and material safety data sheets.

The social partners (the employers' organisations and trade unions) have representatives working with occupational health and safety at a central level. Some of the larger organisations have several representatives working full time with these questions. One of their tasks is to support their members in OSH matters, and especially the employers' organisations provide support to those members that contact them about OSH and also offer OSH training courses to their member companies. An important focus in their support to the member companies is to interpret what is required according to the law and OSH regulations from SWEA and to advise members on how to deal with different kinds of problems. Another important task is to represent their member companies in relation to national authorities and the EU, for example in discussions about new legislation.

The employers' organisations and the trade unions are organised according to sector and most of these sector organisations (both among employers and trade unions) have a well-established cooperation regarding occupational health and safety issues within the sector. Within many sectors, there are committees with representatives from the social partners meeting several times every year to work together on initiatives to support the development of good and safe working environment.

The authority and the social partners can be seen as complementary actors, where the authority decides what is required and makes inspections to check that the workplaces follow the demands in the regulations. However, they do not provide much support on how to solve problems identified. Support is mainly offered regarding what is required according to the regulations and guidance on how to interpret the regulations. Support regarding how to solve problems is instead offered by other actors such as the occupational health services providers, the social partners and their OSH experts, and the regional safety representatives from the trade unions.

The social partners also cooperate on financing working environment research, through AFA Insurance, which is an insurance company responsible for the work injury insurances within the private sector, municipalities and county councils. AFA also provides economic support to Prevent, a non-profit organisation established by the social partners in the private sector. Prevent develops different kinds of materials and training courses on OSH at the demand of its owners.

1.3 National policies for MSEs with impact on OSH

The Work Environment Act from 1977 (*Arbetsmiljölagen*, AML) is a framework act which provides direction in broad terms and sets the goals for achieving a good work environment. The AML applies to all areas of occupational life, including students and the self-employed. A central provision of the AML is

that the work situation and the working environment must be adapted to the employees and their physical and mental abilities and conditions (AML ch. 2). Responsibility for the work environment is assigned as a general preventive duty for employers, but also for those who produce, import and market work equipment and tools, as well as for architects and designers involved in the design and construction of workplaces.

Work environment policies and legislation are cooperation and consensus oriented, and chapter 6 of the AML is dedicated to cooperation in the local OSH management at company level. The AML specifies that companies with five employees or more should have a safety representative, and companies with 50 employees or more should have a safety committee.

The regulation on systematic work environment management (AFS 2001:1, *Systematiskt arbetsmiljöarbete*, SAM) is a central regulation enforced by SWEA. The provisions specify the employers' responsibility and the rules on work environment management in terms of routines, knowledge and risk assessment of the work environment. The SAM provisions incorporate parts of the EC Framework Directive on safety and health of workers at work (89/391/EEC).

The legislation and the provisions from SWEA regarding OSH are general and to be followed by all companies, regardless of size. There are, however, some exemptions. MSEs with fewer than 10 employees have a few exemptions from the SAM provisions concerning the requirement for written documentation. Risk assessments, action plans and instructions for hazardous work must be documented, but policy documents, routines and the annual audit do not need to be documented in writing.

1.4 Available expertise for MSEs regarding OSH issues

According to statistics from SWEA (Weiner and Hultin, 2006), in 2006 about 60 % of MSEs were affiliated to an occupational health service provider. Through the affiliation they have access to OSH-related services such as medical services; rehabilitation with a focus on what can be done at the workplace level, for example adjusting the work and the workplace; and preventive services. OSH providers also provide medical services such as regulatory health check-ups related to hazardous exposures at the workplaces, for example exposure to asbestos, high concentrations of quartz, lead, vibrations and noise. However, the occupational health services act on a market basis and the MSEs decide what services they want to purchase. It has been shown that MSEs mainly use services such as general health check-ups, which have little relevance to and impact on the workplace and the OSH conditions. The preventive services are used to a much lesser extent than the more reactive services, for example rehabilitation and health promotion services with a focus on the individuals rather than the workplace. The general health check-ups, which usually have little impact on OSH conditions, are the most commonly purchased service (Schmidt et al., 2016).

Those MSEs that have one or more employees affiliated to a trade union may be visited by regional safety representatives (RSRs). The blue-collar unions' RSRs visit the MSEs about once in a few years. In 2015, RSRs made in total about 56,000 visits to MSEs (SWEA, 2016a). Some MSEs use the RSRs as advisors and ask them for advice regarding their occupational health and safety. The RSRs have the highest coverage among the actors providing some kind of personal OSH support to MSEs in Sweden (Frick, 2009; Frick and Walters, 1998).

The authority, SWEA, inspects MSEs but tends to focus on sectors with high risks or sectors that have been selected for a campaign. On average, MSEs may be inspected approximately once per two decades, but MSEs in some sectors are rarely inspected at all while MSEs in high risk sectors may be inspected once every few years. Even though SWEA's main responsibility is to inspect the work environment and the management of it, it may also refer the MSEs to sources of support and help, in order to help the MSEs to solve the problems identified during inspections. They do not, however, give concrete advice on how to solve problems.

The social partners are an important source of support to MSEs regarding OSH and how to solve OSH problems. They provide support in many different ways.

- The social partners have representatives/stewards with expert knowledge about OSH and the regulations relevant to their sector (called OSH experts below). They can give support by phone

to their members or their representatives and occasionally visit member companies. They often also arrange OSH training for groups of companies.

- The social partners also work together (representatives of the employers' and employees' organisations) and develop different kinds of material and courses to be used by their members. In support of this cooperation, there are several bodies producing, marketing and disseminating the material, for example Prevent for the private sector, Sunt arbetsliv (Healthy Working Life) for municipalities and county councils, and the central government Social Partners' Council (*Partsrådet*) for the governmental sector. These organisations are usually owned by the social partners and serve as executive bodies for development of, for example, information material and training courses decided by the social partners.

SWEA has a website, which provides information and tools regarding OSH and OSH management which are free to use.

2 Design of the data collection

Three workshops were arranged, aiming at discussing the participants' experiences of OSH conditions in MSEs, how OSH conditions can be improved and the barriers hampering improvement. It was decided to arrange workshops for the manufacturing, construction and cleaning sectors.

For each sector, a preliminary list of potential participants was drawn up including representatives from the main national stakeholders: the work environment authority (SWEA), employers' organisations, trade unions, OSH providers, Prevent, MSEs, the Swedish focal point and the Swedish EU-OSHA 'OSH ambassador'¹. The invitations were made by phone followed by an email and in some cases only by email.

All the main groups of stakeholders were represented at the workshops (see Appendix). This included representatives of two of the major OSH providers that chose to participate in the workshops about construction and manufacturing, and representatives of MSEs who took part in the cleaning and construction workshops. It was, as expected, difficult to recruit MSEs to the workshops, and none of the MSEs visited and interviewed in the case studies could participate.

The absence of representatives from the employers' organisations in two of the workshops may have affected the discussions. However, complementary interviews with their representatives were conducted afterwards in order to integrate their experiences in the analysis of the workshop discussions to mitigate any potential biases from the workshop. Moreover, EU-OSHA's Swedish 'OSH ambassador', representing the Enterprise Europe Network, took part in two of the workshops.

The workshops' programme was designed in accordance with the guidelines developed within the current research (see also EU-OSHA, 2017), starting with participants describing their background and experiences of OSH and of OSH management in MSEs, including factors contributing to good OSH, followed by a discussion reflecting on the introductory presentations. The programme was sent out to the participants in advance and they were encouraged to give feedback on the programme, for example if some important aspects were missing. No feedback was received; nevertheless, the participants had got familiar with the topics, which facilitated the discussions.

The participants all worked with OSH, many of them full time, and all had experience of working with OSH in MSEs. During the workshops, discussions were organised within groups of mixed stakeholders and with the whole group. There were facilitators at each workshop who also took notes that were used as a basis for this report.

¹ Since 2009, EU-OSHA has been cooperating with the Enterprise Europe Network (EEN) to raise awareness of OSH among SMEs and micro-enterprises. To carry out this task, the EEN nominates OSH ambassadors at country level. Their role comprises coordinating activities and promoting OSH to SMEs at national level (<https://osha.europa.eu/en/about-eu-osha/what-we-do/corporate-strategy-and-work-programmes/cooperation-with-other-agencies/european-enterprise-network>).

3 Findings

3.1 Role and function of intermediaries in OSH improvements in MSEs

3.1.1 Organised and unorganised MSEs

The discussions confirm the results from the literature review (EU-OSHA, 2016). Many MSEs have little contact with OSH stakeholders. However, Sweden is a country with a well-developed organisational structure, with high levels of affiliation both to sectoral and employers' organisations and to trade unions. Through companies' membership of employers' organisations and workers' membership of trade unions, MSEs have access to OSH support. This support is, however, not fully utilised, which is further discussed below.

The three workshops reflected similar views on which MSEs are reached by the stakeholders and which are not. The employers' organisations reach out to their members. Many of their members are MSEs; in one of the employers' organisations represented at the manufacturing workshop, 80 % of the member companies are MSEs. In the sector covered by this employers' organisation, 93 % of the companies are MSEs with at least one employee. The employers' organisations organise a higher share of the large companies than of MSEs. Even if there are a large number of MSEs who are members of employers' organisations, MSEs are still underrepresented compared with their numbers in the sectors.

There are many companies, especially micro-companies but also small companies, that are not members of employers' organisations and hence get no support from the employers' organisations.

3.1.2 Employers' organisations

The service offered by the employers' organisations and sector organisations are reactive services, for example when someone phones in order to get support with an immediate problem. In addition, the organisations usually offer OSH training focusing on what is required according to the law. The MSEs reached through this support are companies that to quite a large extent are stable and well-functioning. They are often aware of the OSH requirements or have been inspected and need to get support on how to deal with the demands from the authorities. Some MSEs contact the OSH expert after having had an occupational injury or a near-accident, or a safety representative or employees have requested OSH improvements.

The employers' organisations have collective agreements with the trade unions in their sector. These agreements may include OSH-related issues, though often merely as a marginal remark. It was, however, commented on both by employers' organisations and by trade unions that these collective agreements were not always known and therefore not complied with by MSEs.

3.1.3 Trade unions

The trade unions reach MSEs mainly through the regional safety representatives, who may visit MSEs where at least one of the employees is a member of the trade union. MSEs potentially covered by the RSRs are more numerous than the MSEs that are members of an employers' organisation. There are, however, also many MSEs and especially micro-companies that are not reached at all through the employers' organisations or trade unions.

The regional safety representatives have a basic OSH training course of five days and a supplementary course of five days. When RSRs visit MSEs they cannot act like, for example, a labour inspector from SWEA. They possess the same rights to act as a safety representative. They aim to establish a dialogue with the owner-manager of the MSE and with the employees. This dialogue aims at increasing the owner-manager's understanding of OSH issues and motivating the owner-manager to improve OSH as well as the workers to take part in the OSH management.

A regional safety representative from the construction sector commented that there are MSEs in the sector which are good at OSH and work preventively. As RSR, he seldom visits these companies, as he has no reason to do so. The MSEs visited usually have the potential to improve OSH and OSH management.

How the RSRs work with MSEs may vary across the country. In rural areas with a lower density of construction firms, there is more time to talk and give advice on OSH, and the MSE manager is often available at the construction site. In large cities with many construction projects ongoing, it may be difficult to find and meet the manager, and the RSRs usually meet the workers, but only occasionally the site manager, top manager or CEO of an MSE.

3.1.4 Differences between sectors

Regarding the overall coverage, there seem to be some differences between the three sectors. The manufacturing industries are probably more organised than construction and cleaning companies. In the construction sector, there are differences between companies working mainly in the business-to-business (B2B) market and those working in the business-to-consumer (B2C) market. B2C companies are often micro-companies that are less organised than the B2B companies. In the cleaning sector, there are many micro-companies that are not organised and with employees who are not members of trade unions. These unorganised MSEs with unorganised employees are not reached at all by the OSH support provided by the employers' organisation and trade unions.

The OSH problems encountered vary between the three sectors. In the cleaning industry, strain injuries due to repetitive work and slips, trips and falls are common. In manufacturing, there are also accidents with machines. In many companies there may be complex chemical exposure. In construction, it can be difficult to arrange good working environments, for example with the aids desired or with proper process ventilation, which may lead to increased risks of accidents, heavy or repetitive work, or exposure to dust and chemicals.

The employers' organisation for the construction sector offer personal support to its members through six full-time OSH advisors across the country. The employers' organisation for the manufacturing sector provides advice to member companies through its regional offices, each with an advisor appointed as responsible for OSH questions. If needed, these regional advisors may turn to the national OSH experts, and companies may contact the national experts directly if they prefer to do that instead of contacting a regional office. The questions often concern labour legislation and collective agreements, and sometimes OSH. This kind of support is not available for the cleaning industry. For other sectors, support is given by an OSH expert, usually working in Stockholm and servicing the entire country. Large organisations may have a few OSH experts and small organisations may have a part-time OSH expert.

3.1.5 The Swedish Work Environment Authority

SWEA conducted about 21,000 inspections in 2015. There is, however, no information on the distribution between different sizes of companies. The companies that are easiest to reach are those that are well organised and fulfil the regulatory demands, for example construction companies following the requirement to report ongoing construction work over a specified size. The authority prioritises companies in high-risk sectors and designated campaigns, and acts when safety representatives request an inspection (called 6.6a after the chapter and paragraph in the Swedish Work Environment Act according to which safety representatives may call for a visit by the authority in order to decide if measures to improve OSH are needed). On a regular basis, SWEA carries out inspection projects targeting SMEs in such sectors as construction, transport, and hotels, restaurants and catering.

SWEA is important because it can also reach out to unorganised MSEs. However, its resources are limited and only a small proportion of MSEs can be visited and inspected.

The authority not only inspects. SWEA provides an answering service, which anyone can call or ask questions by email. According to an inspector participating in a workshop, about half of the questions concern construction and MSEs. In Southern Sweden, the authority has invited construction companies

to information meetings in order to inform them about OSH and initiate OSH management and improvements in the construction companies.

3.1.6 OSH professionals

Occupational health services are private organisations operating in the OSH market. According to statistics from 2006, 60 % of MSEs were affiliated to an OSH provider. Since then, however, the degree of affiliation to OSH providers has decreased somewhat and the share of MSEs affiliated has probably also decreased. According to a recent study on Swedish MSEs' affiliation to OSH providers (Schmidt et al., 2016), the providers rarely market their services to MSEs, which probably affects the share of MSEs with an affiliation to OSH providers. The OSH providers participating in the workshops confirmed that they have difficulties reaching MSEs and that they have few resources designated for marketing their services to MSEs. In general, OSH providers are in touch with only MSEs with which they have a contract. Other MSEs are difficult for OSH providers to reach. Their experience of MSEs is that the preventive work is often lacking, and injuries that develop over time such as strain injuries are common.

Active and competent MSEs may purchase preventive services from the OSH providers. Uninformed MSEs are less likely to be aware of the preventive services available through the OSH providers. It was agreed by the workshop participants that many MSEs do not know what kind of services occupational health service providers can offer. This is in line with results from previous studies (Antonsson and Schmidt, 2003; Schmidt et al., 2016).

3.1.7 Other intermediaries

Other intermediaries were discussed mainly as potential carriers of OSH information in a context where OSH information could fit in well and have an impact.

The European Enterprise Network's (EEN's) Swedish EU-OSHA 'OSH ambassador', who participated in two of the workshops, works in an organisation supporting MSEs in the development of their businesses, and many of the businesses it meets are new businesses and MSEs. When meeting these businesses, it would be very fitting to provide some information about OSH responsibilities and some guidance on how to go about working with OSH. This is not done at the moment but such a routine is possible to develop.

In construction, some MSEs and especially micro-companies work in a B2C market. Most private customers are not aware of their OSH responsibilities. According to Swedish regulations, the commissioner of a building or of construction work is responsible for OSH. For many construction projects, there is also a requirement for building permits, issued by the municipalities. It was suggested that one way to reach out to MSEs working in this market could be to establish cooperation with the municipalities organisation for building permits in order to provide information to the commissioners about their obligations regarding OSH. Cooperation with the municipal authorities and the building permit process is a way of integrating OSH in an existing building control process.

3.1.8 Conclusions

To summarise, the well-organised MSEs and the largest of the MSEs, which also know about OSH regulations and OSH demands, are usually reached through and supported by their employers' organisations. Those that are less knowledgeable but organised are often reached through the regional safety representatives of the trade unions. The micro-companies that are not members of employers' organisation and have no employees who are members of the trade unions are often not reached at all; many of them are not aware of OSH or OSH regulations, and therefore do not even think about searching for OSH support. This seems to be more common in the construction and cleaning sectors. A general conclusion in the workshop was that the MSEs that are most difficult to reach are probably those operating in a B2C market. MSEs in a B2B market can be expected to have a somewhat higher impact on OSH from their customers, as businesses in general are more prone to be aware of OSH regulations and demands than private customers.

3.2 Barriers to and enablers of improved OSH in MSEs

3.2.1 Managers' knowledge of OSH

A recurring theme in the workshops was the OSH competence of the owner-managers in MSEs. This was mentioned by, for example, the regional safety representatives, claiming that the awareness of OSH is low in many of the MSEs they visit. It was concluded by several of the stakeholders that owner-managers with poor OSH competence are difficult to reach out to. Several of the RSRs stated that, when visiting an MSE with an uninformed owner, they usually started by proposing that the owner should participate in an OSH course. When the owner-manager had gained a basic understanding of OSH it was considered much easier to continue the discussion on OSH management and improvement of the OSH conditions.

The RSRs perspective can be reflected on and compared with a description by the owner-manager of a cleaning company of 40 employees. He had recently started working with OSH and had taken an OSH training course. He explained this as a natural development. When he started his firm, most of his working hours were devoted to making the company survive, develop and grow. He had just recently had time to spend on other topics such as OSH, which was not considered necessary for the survival of the company.

When managers have at least basic OSH knowledge it enables improvement of OSH conditions and a more systematic way of working with OSH.

3.2.2 Many MSEs have a reactive approach to OSH

The collective experience of the participants in the workshop was that most MSEs have a reactive approach to OSH. When something has happened, MSEs ask for help in order to solve the acute problem. The problem may be raised through an inspection by SWEA, by an accident or near-accident, or by a safety representative or an employee discussing an OSH problem and asking for OSH improvements. It is also common for MSEs to contact the employers' organisations to discuss a conflict between the safety representative and the employer. The OSH experts at the employers' organisations give advice on OSH in relation to what is demanded by the Work Environment Act and OSH regulations. A representative of a manufacturing employers' organisation said that there is, in general, little interest in improving OSH and exceeding the regulatory demands, and there is little interest in using OSH as a lever for developing the company, including its effectiveness, productivity and quality. A representative of another manufacturing employers' organisation did not entirely agree. Some companies have a reactive approach, but many companies care about their employees and are aware that a good working environment is important for efficiency, productivity and quality as well as the employees' wellbeing. In many companies the employees are the most valuable asset, and their wellbeing is important, as is their interest in staying in the company and not getting injured by the work.

The OSH experts at the employers' organisations and regional safety representatives say that they are usually contacted when something has happened. However, it can also be assumed that OSH improvements are made in many MSEs without any contact with intermediaries and hence without the intermediaries knowing about the OSH improvements undertaken. As an OSH expert from a manufacturing employers' organisation concluded: 'We are only contacted when companies have problems, not when everything works well.'

3.2.3 Workers' participation in OSH

Throughout the three workshops, OSH was discussed as something that needed to be dealt with by owner-manager and workers, including safety representatives, jointly.

An experience discussed in all three workshops was that it might be difficult to appoint safety representatives in MSEs. The OSH experts from employers' organisations had all experiences of owner-managers in MSEs who were concerned about the lack of a safety representative in their companies. Some of the owner-managers even wanted to appoint a safety representative themselves (which is not in line

with the Swedish Work Environment Act, according to which the safety representatives have to be appointed by the trade union or by the workers themselves).

Even if the safety representatives were usually seen as an asset to MSEs, it was also discussed that safety representatives could sometimes be seen as a threat to owner-managers, as many safety representatives have better knowledge of OSH than the owner-managers.

Meetings, discussions and follow-up on what has been discussed and decided between owner-managers and safety representatives were discussed as enabling improvement of OSH conditions. However, in the cleaning sector, the cost of cooperation with workers was considered to be a barrier. In this sector, the cost of wages is the main cost in the business. Hence, working hours need to be used in a way which generates income. Using several working hours for the entire staff to discuss OSH matters is therefore considered expensive, and less expensive means of cooperation with workers are sought. In addition, cleaners are usually working at the customers' premises and many cleaners work alone, without any colleagues from their own company. This lonely work hampers OSH discussions.

3.2.4 Support is appreciated

In all three workshops, it was agreed by all stakeholders that most MSEs were happy about the different kinds of support they got from different kinds of advisors, such as RSRs, OSH advisors and OSH services. They appreciate personal contacts, getting advice adapted to their needs and conditions, and someone to discuss OSH with. It is especially appreciated if the OSH advisors can visit the company. Due to restricted resources, however, most advice is given by phone. When discussing how to reach out to companies in the cleaning sector and improve OSH, an MSE owner-manager commented that the RSR visits obviously did the trick in his company. The steward at the Swedish Building Maintenance Workers Union had good experience from working as a regional safety representative and establishing a dialogue with both the owner-manager and workers, which resulted in improvements to accommodation rooms and the physical working environment including access to the premises, ladders and dealing with asbestos. At the workshops, non-threatening ways to approach MSEs were mentioned and considered important. An OSH advisor in the construction industry said it is important not to focus on mistakes but to have an open-minded approach in the dialogue.

MSEs also appreciate different kinds of working materials such as checklists, information material and templates. Checklists were in fact mentioned as appreciated tools by representatives of all stakeholders and from all three sectors. The use of checklists was discussed in more detail in the manufacturing workshop. The checklists was considered a good start and a comparison was made with implementation of lean production principles (lean). Simple and easy-to-use tools are often used to start the implementation of lean. A checklist was considered a much better start than talking about OSH management, which was often considered by owner-managers as very complex and difficult, requiring a lot of time. Easy-to-use tools for lean give the companies a feeling of actually starting to work with lean, making improvements in a quite fast and easy manner. When working with easy-to-use tools, knowledge increases and it is possible to move on to more complex tools and solve more complex and difficult problems.

There are, however, also limitations to the materials provided. Some material may be difficult to understand and used only if the MSE gets an introduction to how to use it. Reading abstract text about the use of the material is a barrier. Another barrier is if the use of a material encourages use of copy-paste or filling-in material only in order to be able to show a required document. For example, it was mentioned that written OSH policies, which are required by all companies with 10 or more employees, are often a copy-paste document which has little meaning in the MSE and little impact on OSH conditions and OSH management. In such a case, the written documentation mainly functions as a façade, without any impact on OSH. This problem is confirmed by an OSH advisor for the construction industry. She says that, if you distribute a template to be filled in, the result is mainly paper without any practical effect. In MSEs, the owner-managers are instead interested in real cases. It needs to be concrete.

In MSEs people focus on solving problems in order to do things right. (OSH advisor working for the Swedish Construction Federation)

And, as was said repeatedly in the workshops, it is important that doing things right needs to be easy for MSEs. In the construction sector, the OSH advisor stated that owner-managers are used to working with concrete problems and solutions. They do not put a lot of effort into abstract descriptions and abstract analysis; they are not used to that. One example of this was a carpenter who had been promoted to site manager. He knew about the rules that applied, but for him it was difficult to search for the rules in the documentation available.

Another experience of the OSH advisors at the employers' organisations is that short courses are also appreciated by MSEs, even if their participation in such courses could be increased.

It was discussed in the manufacturing workshop that, in order to make good use of the personal support provided, it is good to adapt the communication with MSEs to the seasons when they have spare time to spend on OSH. Depending on the sector, these seasonal variations in the workload may vary.

There are a growing number of MSEs owned by immigrants, many of whom have a background in countries with different values about OSH and different ways of working with OSH and OSH management. There is a need to reach out to these MSEs. However, it can be assumed that many of them are not organised in employers' organisations and have unorganised employees, for which reasons they may be even more difficult to reach out to.

A shared experience for many of the participants in the workshops who regularly provide advice regarding OSH is that they usually do not get back to ask further questions about the issue advised on. This is interpreted as the MSEs being content with the advice they get. In the construction sector, this interpretation is supported by results from inquiries to members, which show that the members are content with the support they get.

3.2.5 Concrete advice on good OSH

In general, at all three workshops it was concluded that MSEs ask for concrete advice on how to solve the problems they experience or someone else points out.

There were some comments on the format of the OSH knowledge. The silent book, a book about safety in construction with illustrations showing risks and safe behaviours, was appreciated as a good way of conveying OSH messages to workers who do not read (or speak) Swedish. The silent book has been developed for the construction industry. A silent book was also discussed at the cleaning workshop and was also considered appropriate for this sector.

In the workshops there were several comments on written documentation on OSH that served as a paper exercise which the employer could show as an evidence of OSH management rather than improved OSH. An OSH advisor in the construction industry said that there was a demand for advice on how to deal with concrete problems. The administrative routines were not a focus when talking about OSH in the construction sector. Instead the focus was on how to solve concrete problems.

At the manufacturing workshop it was discussed that just sending out written material to MSEs was not very effective. A combination of personal meetings, discussions and some written working materials and information was a strategy applied by many of the stakeholders supporting MSEs. Still, sending out materials is cheap and reaches many MSEs, so this method may still be cost-effective. Sector magazines are another way of disseminating OSH information which may be effective.

3.2.6 Follow-up is needed

Improving OSH conditions and OSH management cannot be done once and for all. It is instead, and must be, an ongoing process. Recurring contact, reminding and supporting MSEs, and follow-up on what has been decided is good support which keeps the processes going.

The regional safety representatives visit companies several times and usually follow up on previous visits. It is possible for them to gradually increase and develop the discussion about which OSH demands in the regulations the MSEs have to meet. This gradual increase in and development of the OSH discussion is described as a strategy they often apply.

Labour inspectors also follow up on inspections, mainly to check that the demands have been fulfilled.

3.2.7 Motivation and incentives

Most participants in the workshops agreed that MSEs say that they are very concerned about their employees' safety and it would be a disaster if someone got injured when working. This view was also reflected in several of the interviews conducted in the previous phase of the project (EU-OSHA, 2018). However, this is not a strong enough incentive for them to work on OSH management, mainly because they are not aware of the risks and often believe that they have little ability to reduce the risks, as that responsibility mainly lies with the employees. Even if MSEs want to do the right thing, it is difficult for them to know what the right thing to do is.

The Swedish Work Environment Authority has introduced fines connected to the demands in certain paragraphs in the regulations. In construction, for example, there is a fine varying between SEK 10,000 and SEK 50,000 (about EUR 1,000-5,000), depending on the number of employees, if the compulsory working environment plan is missing. The risk of fines was considered a strong incentive for MSEs to comply with the regulations or at least with the paragraphs in the regulations for which there are fines.

There are different kinds of authorisation and certification schemes available in different sectors. Authorisation and certification was discussed as an interesting opportunity to block out companies working in the grey and black economy and support companies that obey the law and the OSH requirements and pay taxes and social security fees.

The value chain was discussed at the workshops and, especially for construction, making demands in the procurement of subcontractors was discussed as an interesting method to improve OSH. Such demands are used, but not very often. Instead there is a risk of OSH deterioration when moving from, for example, the building proprietor along a long chain of subcontractors and sub-subcontractors. High-risk large companies are more prone to pose high OSH demands when procuring construction services. Development of OSH demands in procurement was considered interesting to develop further. Possible procurement demands are, for example, demands for an OSH coordinator for the execution phase (BAS-U) and demands for specific competence verified, for example, by certificates from specific OSH training courses.

Procurement demands were also discussed at the cleaning workshop. OSH is often not dealt with in the procurement process. Reasonable demands that were discussed and which could be included in the procurement are, for example, access to water and a toilet. If this is not mentioned in the procurement, it may be difficult to pose such demands later on. There is often a concern about losing the customer if one poses demands which are difficult for the customer to fulfil. However, it was also discussed that cleaning companies need to pose clear demands on their customers in order to improve the status of cleaning work.

One problem highlighted in the discussion about procurement demands is that, even if there are demands posed in the procurement, it is seldom checked that these demands are met. This may lead to decreasing respect for procurement demands.

3.2.8 Barriers for improved OSH in MSEs

▪ A competitive market

In construction as well as in cleaning, the competitive market was discussed by the employers' OSH experts as a barrier to working with OSH, as it may force the employer to diverge from the rules at the workplace, including OSH routines, in order to meet the demands of the customer for whom they are working. If they diverge from the customer's demands, there is a risk of losing the job and maybe also future jobs. An OSH advisor in the construction industry pointed to building proprietors, especially small ones, who are not always aware of the OSH regulations and their OSH responsibilities.

Almega, an employers' organisation, has developed an authorisation scheme for cleaning companies. This scheme is a way of ensuring that cleaning companies obey the law and live up to certain criteria, which are regularly followed up on. Among the authorised companies are large cleaning companies but

also many MSEs. Promoting authorised cleaning companies is a way of reducing the competitive pressure from cleaning companies in the grey or black market, companies that do not pay taxes and pay low wages, for example to immigrants without working permits.

The competitive market is decisive for the cleaning companies. The advisor from Almega had the experience that the competitive market was especially tough in the large cities. The owner-manager of a cleaning company (active in the Stockholm region) said at the workshop: '90 % of the customers make their decision based on the price and select the lowest price.'

Cleaning is often considered to be a side issue for the customers that engage cleaning companies. However, cleaning also constitutes the largest share of the running costs for maintaining buildings, and designing cleaning-friendly premises can reduce that cost. This is, however, seldom discussed.

- **Difficult to prioritise OSH**

Provision of OSH training courses is important in order to increase MSEs' OSH knowledge. An OSH expert from the manufacturing sector had the experience that it was difficult to recruit MSE owner-managers and safety representatives to OSH training courses. A reason is that they probably have difficulties in using time for such training courses, considering all other work tasks that are prioritised. In the manufacturing workshop, it was discussed that MSEs take risks when they do not work actively to fulfil the OSH demands according to the regulation. When they take these risks, they also gain some time, which they use for the survival of the company and to avoid production losses.

Web OSH courses are an option that may suit many MSEs. However, even if the OSH training courses are adapted as much as possible to the MSEs' conditions, several of the workshop participants claimed that many of them will not take such a course if there is no kind of pressure on them to do so.

- **Lack of understanding of risks and responsibilities**

A barrier in some MSEs is the presumption of some owner-managers that they are already aware of and in control of the risks, as they apply the routines they have already applied for many years, without experiencing any injuries.

Another barrier especially in micro-companies is that there is little time for administrative work. It is common that the manager deals with administration in the evening or at weekends, in order to devote the daily working hours to participating in the production. Developing administrative routines for OSH management can then be seen as an administrative burden, if the manager cannot see what can be gained from such routines.

The culture of MSEs has an impact on OSH and OSH management. It is, for example, common that managers trust their workers to deal with OSH issues relating their work. Often the managers are not present at the workplace and perceive that their ability to contribute to safe work is limited. Instead they trust that the workers will be aware of the risks and take measures to work safely. The requirement in the Work Environment Act for the employer to provide safe working conditions is often not known.

- **Lack of dialogue or difficulties establishing a dialogue**

In the Swedish context, a dialogue between the social partners nationally as well as at the workplace level is an important basis for OSH management and for the support developed in cooperation between the employers' organisations and trade unions. In the manufacturing sector, the dialogue was disturbed, because of disagreements about a collective agreement which had been in place for some time. The OSH dialogue between the social partners was hampered by the disagreements, which had an impact on the cooperation regarding OSH, which was considered a great disadvantage by (at least) the employers' organisation.

This experience is interesting, as it illustrates that the dialogue between the social partners is built on trust and joint commitments. If these are disturbed, it may result in difficulties working together on OSH issues. This happens every now and then, for example during the yearly negotiation about wages, but is usually solved and, when there is a solution, the cooperation regarding OSH usually continues.

In the cleaning sector, an increase in the turnover of regional safety representatives has been noted by the steward responsible for OSH. The turnover seems to have an impact on the ability to establish a dialogue with the owner-manager. Regardless of this, most owner-managers seem to appreciate the help they get from RSRs. According to the steward from the Swedish Building Maintenance Workers Union, RSRs are seldom (less than once a year) prevented from doing their job when visiting cleaning companies.

- **Lack of decision latitude regarding OSH**

MSEs in the cleaning sector work at their customers' premises. This means that the design of their workplace is decided by their customers and not by themselves. The customers often do not think about cleaning when designing the workplace. An example presented at the workshop was a new building, where there was a small room designated for cleaning, for example storing cleaning material. In this room, however, there was no access to water and the cleaners had to carry water long distances.

3.2.9 Construction

In construction, the competitive market was discussed by the OSH experts at the employers' organisation as a barrier to working with OSH, as it may make the employer feel forced to diverge from the rules at the workplace, including OSH routines.

A potential enabler for improvement of OSH is the system of identity cards (ID06) for access to construction sites. It was, however, also agreed that this system is under development and needs to be further improved. There are, however, construction sites where ID06 is not needed, such as minor work at private houses.

MSEs in construction were discussed by an OSH advisor. Construction firms started by experienced construction workers well aware of the OSH regulations, and how to comply with them, often consider OSH from the beginning. Professional construction workers without that experience, working alone and occasionally employing a friend, when needed, may not have the OSH knowledge and resources to consider OSH.

At the construction site, the OSH conditions are governed to a large extent by the site manager. Large companies may have written instruction about OSH conditions and OSH management but, at the construction site, the site manager may choose not to follow company rules. If such divergences are noted, they can be corrected, but they may be difficult to discover. If the manager pays attention to OSH, OSH conditions will improve. If the site manager instead shows a laissez-faire attitude, the workers will neither be motivated nor pay attention to OSH. How the site manager acts is also a question of which resources and what mandate he or she has.

Considering the autonomy of many site managers, it is a challenge for the building proprietor and building contractor to assure that the OSH routines are followed in the entire organisation, including by sub-contractors. There are, however, many examples of construction organisations where this has worked and even worked very well, for example the construction of the bridge between Malmö, Sweden, and Copenhagen, Denmark.

3.2.10 Manufacturing

In the manufacturing workshop, incentives in terms of subsidies of different kinds were discussed. For a while there was a subsidy for companies using a consultant to improve safety with different kinds of presses and power shears. However, this subsidy was used only by a few companies. The Swedish work life fund financed OSH improvements at many workplaces, including MSEs, some decades ago.

Subsidies are often time limited and hence not a sustainable solution to OSH improvements. There are potential problems with subsidies to selected companies, for example giving some companies economic advantages compared with other companies in the sector.

3.2.11 ***Cleaning***

The OSH conditions in the cleaning sector are difficult in many respects. Many owner-managers have a low awareness of their responsibility for OSH. The owner-manager of a cleaning company emphasised that it is important to increase the competence of owner-managers in cleaning companies to discuss OSH with the customers, including posing demands on customers.

The OSH expert previously employed at Almega said that, even if there is a will to work with OSH, it may be difficult because of all the urgent tasks the owner-manager has to attend to, such as logistics in dealing with high levels of sick leave among employees, and getting the cleaning work done at many different premises with often short assignments for each customer. Often the owner-managers in micro-companies do the cleaning too.

The cleaners often work alone and may have little contact with other people working in the premises they are cleaning. The psychosocial conditions may hence be difficult for the cleaners.

Many of the approximately 70,000 cleaners (about 50 % according to the expert from Almega) are born in other countries. Many cleaning companies are started by cleaners with little previous experience or training in how to run a business and in OSH. Many owner-managers of cleaning companies are also born in other countries than Sweden. This may affect the OSH conditions and OSH management. Owner-managers and cleaners who have difficulty reading and understanding Swedish will also have difficulty understanding Swedish safety instructions and information about risks with chemicals and how to use chemicals.

According to the OSH expert previously employed at Almega, MSEs from the cleaning industry contacted Almega mainly when they had problems related to rehabilitation. One difficulty is that when there is a need for rehabilitation and changes at the workplace to make the job better adapted to the cleaner, it is usually difficult to make the changes needed. In addition, cleaners often have little education and hence it may be difficult to find another job.

Many questions also concerned sick leave. Less frequent were questions about safety representatives and especially RSRs, as many owner-managers in the cleaning industry did not know about RSRs, their function and their legal rights. Occasionally they also asked about risks with chemical products and ergonomics. Sometimes contact was made after an inspection by SWEA. This reflects a reactive approach, even though there are also some cleaning companies with a more proactive approach. For example, a few cleaning industries took part in Almega's OSH courses, which were given twice a year and upon demand for a small association of small (but not micro-) cleaning companies.

The OSH ombudsman at the Swedish Building Maintenance Workers Union concludes that, in order to reach out to cleaning companies and have an impact on OSH, there is a need for increased resources both for the regional safety representatives and for inspection by SWEA. He also reflects on how to improve OSH and regrets that he did not use Chapter 6, § 6a of the Swedish Work Environment Act to ask for support from SWEA regarding especially difficult OSH conditions in the cleaning enterprises he visited as RSR.

3.2.12 ***Enablers of improved OSH***

▪ Basic OSH training and getting started with OSH

Web courses were discussed as an option that could suit MSEs better than training courses. However, meeting colleagues and discussion at the training courses was considered valuable. Still, OSH web courses were considered a better option than not taking an OSH training course at all. Presently, the organisation owned jointly by the private employers' organisations and the trade unions, provides several OSH web courses.

Participation in OSH training courses has for a short time been subsidised for managers and safety representatives by AFA Insurance. There was a positive view of the subsidies and the increased OSH training it contributed to. For example, the OSH ombudsman at the Swedish Building Maintenance Workers Union said that it had been good for the cleaning sector. The sum set aside for this was calculated to last for three years, but lasted for just about one year, because of the great demand. Subsidies

seem to enable participation in OSH training. It was discussed and proposed that similar subsidies with a focus on supporting MSE participation in OSH training courses could be a good way of increasing OSH knowledge in MSEs. However, there were different opinions on what was considered the major obstacle: the cost of the training course, or the working hours that were set apart for training instead of work that generated an income. MSEs can prioritise training courses that are demanded by customers but may have difficulty prioritising other training courses, for example regarding OSH.

OSH training is part of most vocational training. In the workshop discussions, it was often commented that this OSH training could be/needs to be improved.

▪ **OSH training in the manufacturing sector**

A representative of the trade union in the manufacturing sector had the experience that starting to talk about order and tidiness was a good way to start working with OSH. His experience was also that many owner-managers in MSEs had themselves been employed in the sector before starting a business of their own. Owner-managers with this background often lack the knowledge needed to run the OSH management demanded.

In the manufacturing workshop it was discussed that, to increase MSE participation in OSH training, stronger incentives are needed.

In the manufacturing workshop, basic OSH training was discussed as a way to increase learning about OSH. The aim of OSH training is to improve OSH learning. Not all training increases learning, and it is important to use methods that contribute to learning, not only to provide OSH training courses. It is often easier to motivate MSEs to learn about OSH when something has happened, and experiences when fatal accidents had happened were discussed as something that had motivated MSEs to learn about OSH and improve OSH conditions including safety.

▪ **OSH training in the construction sector**

In the construction sector, the Entrepreneur School, owned by the employers' organisation, offers OSH training courses. They are deemed to be good and contribute to improve OSH in the sector. There is, however, competition in offering training courses, and other courses are offered at a lower price by other commercial companies. It was commented that the other courses were often of a lower quality. One type of courses are training courses for the compulsory OSH coordinators that need to be appointed for the planning phase (BAS-P) and for the execution phase (BAS-U) of a construction project. The OSH coordinators were considered to be important, and one participant even suggested that there ought to be a certificate for the OSH coordinators. Certification is a way of controlling the quality of training.

An interviewed OSH advisor told about experiences from OSH training together with the trade union for students at high school programmes for construction workers. A three-hour training session was planned, but she concluded it did not work out very well. The students had difficulty sitting still and listening for three hours. She concluded that another pedagogic form was needed in order to reach out to the students and make them understand more about OSH.

▪ **OSH training in the cleaning industry**

The OSH ombudsman at the Swedish Building Maintenance Workers Union discussed the need for an OSH training course for managers. However, there is no such education available.

3.2.13 Sector-specific enablers

▪ **Construction**

OSH advisors are available regionally through the Swedish Construction Confederation, which is an employers' organisation. The advisors form a national advisory group working together and supporting and learning from each other.

An OSH advisor had the experience that the interest in OSH issues has increased during the last 5-6 years. Many factors contribute to this, for example the new system with fines for not complying with certain regulations, increased attention to OSH from the Swedish Construction Confederation through OSH training courses and OSH advisors. There is also an increased awareness of fatal risks at construction sites and risks of occupational injuries and the long-term consequences such injuries may have. This has moved OSH upwards on the agenda of workplace meetings.

It is important to distinguish between construction sites in the B2B and the B2C markets. On large B2B construction sites, foremen are usually present but often there is no representative of the organisation with the main responsibility for the site. At a large construction site, 20-100 subcontractors may work. The B2B market is more organised and often has a great impact from large companies, which makes it easier (though not easy) to control OSH conditions and OSH management. An enabler is procurement demands from large companies (B2B) that may include OSH demands.

A potential enabler of improvement of OSH is the system of identity cards (ID06) for access to construction sites. It was, however, also agreed that this system is under development and needs to be further improved. At some construction sites ID06 is not needed, for example minor work at private houses.

Within the Swedish Construction Confederation, there is a proposal to change the rules for membership (currently two years of accounts for the company are required) and allow a test membership which can be converted to a membership after showing two years of accounts for the company. This test membership allows newly started MSEs to take part in OSH training and sign up to the Swedish Construction Confederation code of conduct. This proposal is aiming at supporting newly started MSEs in establishing a good way of working with OSH from the start.

▪ **Manufacturing**

The experience of the occupational service providers is that many MSEs at least in the manufacturing sector have only a contract to purchase OSH services when needed. The MSEs get in touch with the OSH provider whenever they consider it necessary. One of the services utilised is rehabilitation. However, workplace-related measures, which are an important part of rehabilitation, may be difficult because of limited possibilities of changing work tasks in MSEs. In the 1990s some companies cooperated in so-called employers' rings, where employees from one company could permanently or temporarily move to another company and other work tasks as part of their rehabilitation. These kinds of employer rings are, however, unusual today.

MSEs also purchase OSH training from the OSH providers.

The experience of the manufacturing companies' employers' organisations is that they are mainly contacted by large companies that have a well-functioning OSH management and are interested in discussing how to deal with different OSH topics. MSEs contact the employers' organisation when they need help to deal with something that has happened. MSEs are, for example, interested in an OSH handbook containing short checklists and examples of how to work with OSH. The OSH experts take part in regional networks meeting several times per year. At some of these meetings OSH is discussed and the OSH experts participate in those meetings. During the previous year, organisational and social working conditions were discussed several times because of the new Swedish regulation on organisational and social work environment.

▪ **Cleaning**

The OSH expert previously employed at Almega had the experience that many owner-managers in cleaning companies had themselves experience of being employed as cleaners. Many of them (but not all) are concerned about the wellbeing of their employees. Education about leadership is a good support for many of them, providing an insight into the importance of listening to and discussing with the employees.

In the cleaning sector, there are good experiences from trade unions gathering safety representatives twice a year to discuss OSH matters. These OSH days function as a kind of network where the safety representatives can discuss problems and learn from each other.

For the companies in the cleaning sector, there are no networks, but the owner-manager of a cleaning company stated that the employers' organisation provides good support for the cleaning companies.

A regional safety representative said that he disseminates a lot of information both to safety representatives and to employers. His experience was that many employers believe that OSH is very difficult to deal with, which he stated is in fact not the case.

The advisor from the cleaning industries federation (Almega) said that he often provided complementary material as a support to cleaning companies. For more difficult questions regarding OSH, he referred to the OSH experts at Almega. Questions discussed include, for example, access to washing rooms and showers. He also proposes development of a short guide aimed at supporting especially micro-companies but also small companies in the cleaning sector. The guide needs to be short, easy to use and concrete.

3.2.14 Common understandings among and divergences between the stakeholders

In general, the discussions showed a consensus between the participating employers' organisations, trade unions, authorities and advisors. The consensus covered the understanding of the OSH conditions in many MSEs and the causes of the prevailing situation as well as experiences of what worked well and what did not.

In some discussions there were differences between stakeholders. These differences were mainly due to different perspectives and talking about different groups of MSEs, for example those construction firms interested in and well aware of OSH who contacted OSH advisors compared with small construction firms working in the B2C market. When highlighting the different perspectives, the stakeholders seemed to reach consensus about the descriptions and conclusions.

Some discussions reflected a more political dimension in the opinions of employers' organisations and trade union representatives. For example, representatives of the trade unions argued that some kind of training or OSH certificate ought to be required when starting a business. The employers' organisations, however, argued against this, as it could hamper the establishment of new businesses.

3.3 What works for whom and why?

There are huge differences between MSEs. There are proactive MSEs, though this group of MSEs were hardly discussed at the workshops. The reactive MSEs are common and they may get in touch with their organisations to ask for support when the need arises. Other studies also indicate that it is also common to turn to suppliers for OSH advice (see for example Alvarez et al., 2002), though the suppliers were not represented at the workshops. The MSEs with the poorest knowledge, OSH conditions and OSH management often have no one to turn to for help, if the need should arise and if the owner-manager is aware of the need.

In all three workshops, it was agreed that the basic strategy to improve OSH in MSEs is to start by establishing a dialogue and start with simple actions that improve OSH.

A dialogue requires some kind of personal contact with the owner-manager of the MSE. Such personal contact is available, mainly through the regional safety representatives but also through the employers' organisations' OSH experts and the labour inspectors. However, unorganised MSEs are hardly ever contacted for personal support of any kind. The dialogue can be initiated in different ways. The OSH experts at the employers' organisations support MSEs when they ask for it, so the MSE's needs is the starting point. The regional safety representatives visit companies and may initiate a dialogue based on what they judge to be needed in the visited company. Labour inspectors inspect the workplace but also work on initiating a dialogue with the owner-manager.

The simple actions vary between sectors and stakeholders, even though basic OSH training and checklists were mentioned as a good start by all of them. Another method discussed was a multiple strategy applied by the labour inspectors. They often start with a risk assessment, during which they establish

and develop a dialogue with the owner-manager. The risk assessment increases the awareness of OSH and then it is easier to continue talking, for example about OSH management. This is also a good start for micro-companies, as many of them are not even aware of the requirement to make risk assessments and may not even understand what OSH is about. Another approach mentioned for the manufacturing sector was to start talking about order and tidiness, in order to get started with concrete improvements.

The three sectors discussed at the workshops are different in several respects. The strategies and measures that will improve OSH and OSH management hence need to be adapted to the conditions of each sector.

In the manufacturing sector, the company is in control of the premises and the processes, so advice can be implemented, for example after a decision by the owner-manager. The cleaning companies are much more dependent on their customers, and the OSH conditions are to quite a large extent governed by the customers' demands and premises. In addition, cleaning companies work in a competitive market with competition from companies that do not pay taxes and social security. Construction companies' OSH conditions are complex, with a great impact from the temporary conditions at the construction site including other enterprises working there. In each of these sectors, materials and strategies have been developed to support OSH management, including descriptions of good practice for the sector.

3.3.1 Tailored personal support just in time supports reactive OSH management

In the workshops it was described that MSEs may contact OSH experts or RSRs to get support regarding an acute OSH issue. This is positive, as the MSE can get advice from someone who knows about OSH. However, this tailored advice just in time also has limitations. It mainly supports reactive OSH management, and a challenge for the experts contacted is to develop a dialogue that not only deals with the acute problem but also increases awareness about OSH and initiates more active OSH management and OSH improvements. The discussions at the three workshops have given several examples of strategies applied to achieve this.

3.3.2 Information and working material

Sending out information and working material is often criticised as not very effective in improving OSH. However, many of the OSH experts and RSRs have described that they use different kinds of material, which they leave behind after visiting a company or send to the company they are contacted by. In this way, the material distributed can be better tailored to the needs of the MSE.

Comments also indicate that the material left behind needs to be simple and quick to read (long introductions on how to use material is often not read and the material is seldom used). In addition, it was commented that material that is mainly used for copy-paste management of OSH is of no great use to improve OSH in MSEs.

3.3.3 Incentives

The incentives for good OSH and OSH management are basically that the owner-manager does not want his or her employees to get hurt at work. However, because of lack of knowledge about risks and risk prevention, they are often not able to create a good and safe working environment. In some companies, especially some of the companies that are organised in employers' organisations, other incentives for good OSH that relates to their business interest are also important, such as quality, productivity and being an attractive employer.

The drivers for improving OSH and OSH management vary between sectors. Fines seem to be effective incentives, though they are possible only for a selected number of issues not for OSH requirements in all sectors.

Procurement demands and other demands from customers are an important incentive but need to be followed up in order to be effective.

A strategy discussed was to better integrate OSH in the processes of the companies, for example processes in which other authorities are involved. One such example is the municipalities' building permits before establishing a construction site. Even though municipalities have no responsibility for OSH at construction sites, it would be good to include information about OSH responsibilities for the building proprietor in that process.

4 Conclusion

The discussions at the workshops and the complementary interviews reveal differences between sectors. The differences are of course related to the kind of work carried out, but other factors, such as the decision latitude of the company compared with what is decided by the customer when working at a site that someone else is in charge of or in someone else's premises, have an impact on OSH and OSH management. The impact from customers also varies within and between sectors. Business customers (B2B) may have more impact than private customers (B2C). Business customers prioritising low prices are less likely to consider OSH issues, for example in procurement, while business customers in high-risk sectors may be more aware of OSH and more likely to pose procurement demands on OSH.

There is substantial support available to MSEs, but this support mainly reaches out to organised companies or companies with organised employees. RSRs visit many companies where they have members. OSH experts at the employers' organisations mainly respond to questions and offer OSH training courses and information. Inspections are conducted but with considerably lower coverage than the RSRs.

The number of MSEs with safety delegates is decreasing, especially in the private sector. In the Swedish context, dialogue about OSH is important and, without safety representatives at the workplace, that dialogue may be difficult to establish. RSRs can contribute to the dialogue, but their annual or biannual visits cannot replace a local safety representative. This development needs to be discussed and strategies developed to secure a continuous OSH dialogue at the workplace level of MSEs. The importance of such a dialogue was emphasised by all stakeholder groups at the three workshops.

A general conclusion from the three workshops is that improving OSH management is seen as a process, where continuous support can help MSEs develop preventive OSH management. The experience of the participants was that good starting points for this are short OSH training courses for the owner-manager and concrete tools providing concrete advice on how to improve OSH. However, most MSEs do not take such courses and, when they do so, it is mainly as a reactive approach to OSH, for example after personal contact with some kind of OSH advisor (including RSRs), when something has happened or when someone (employee, safety representative or labour inspector) demands OSH improvements. Personal contact is one good way of discussing such courses, motivating MSEs to take part. However, the resources for such personal contacts are limited and provided mainly for companies that are members of employers' organisations or with employees who are members of a trade union. Templates that can easily be filled in and are mainly used as documentation and proof of OSH management were considered as not effective. This is probably because of the working practices in the MSEs in the three sectors, which focus on doing the job and have little involvement of written documentation and routines.

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6 Appendix

Table 3 Reported occupational accidents with absence from work (incl. fatalities) and work-related diseases in 2015 among employees by size of working place

Size of establishment	Work-related accidents		Work-related diseases	
	Number of cases	Number of cases per 1,000 employees	Number of cases	Number of cases per 1,000 employees
0 employees	233	Not applicable	74	Not applicable
1-4 employees	1,357	3.0	376	0.8
5-9 employees	2,141	5.2	672	1.6
10-19 employees	3,641	6.7	1,293	2.4
20-199 employees	15,409	8.1	5,494	2.9
200 employees or more	7,437	6.8	3,307	3.0
No information available	878		832	
Total	31,096	7.1	12,048	2.7

Source: SWEA, 2016b (Table 7).

It is difficult to interpret this kind of statistics, as there is evidence for MSEs not reporting all work-related injuries. There are also huge differences between sectors, which are not visible when presenting statistics for all Swedish establishments. The picture reflected in table 3, that the smallest and the largest companies have the lowest frequencies of work-related injuries, with the micro-companies with 1-4 employees usually having the lowest frequency, is consistent between sectors (SWEA, 2016b).

Organisations represented in dialogue workshops and interviews

- Workshop, manufacturing sector, 22 November 2016

IF Metall (trade union)

Teknikföretagen (Association of Swedish Engineering Industries)

Livsmedelsföretagen (Swedish Food Federation)

Industriarbetsgivarna (Swedish Association of Industrial Employers)

Previa (occupational health service provider)

One member of Enterprise Europe Network (EEN)

Svetskommissionen (Swedish Welding Commission)

Swedish Work Environment Authority (SWEA)

- Workshop, construction sector, 23 November 2016

SWEA

Byggnads (Swedish Building Workers Union)

One company with 130 member companies, mainly MSEs working with heating, ventilation and sanitary installations

Feelgood (occupational health service provider)

One member of EEN

- Workshop, cleaning sector, 23 November 2016

Two cleaning companies

SWEA

Fastighets (Swedish Building Maintenance Workers Union)

One member of EEN

Hotell och restaurang (Swedish Hotel and Restaurant Workers' Union)

Prevent

- Additional interviews

One member of EEN and Swedish OSH ambassador

Prevent

Almega (employers' organisation for the cleaning sector and several other sectors)

Swedish Construction Federation

Fastighets (Swedish Building Maintenance Workers Union)

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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