

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

European Risk Observatory

National Report: Denmark

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1 Description of the national context

The Danish economy is often ascribed a high share of small and medium-sized enterprises. However, looking at the European figures in detail, it may be more accurate to say that there are fewer very large companies in Denmark (see EU-OSHA, 2016: 24-7). When it comes to firm sizes, Danish companies appear to be close to European averages in most aspects. Altogether 62.3 % of all people employed in Denmark work in a company with more than 100 employees. Sectors with higher shares of micro- and small enterprises (MSEs) include agriculture, where 68.4 % of all workers are employed in a company with fewer than 10 employees. In addition, construction and hotels and restaurants have many smaller and medium-sized companies: 58.3 % of all construction workers and 71.2 % in hotels and restaurants work in a company with fewer than 50 employees, compared with the national average of 30.7 %. Healthcare also has a high share of MSEs because general practitioners have their own businesses. On the other hand, public services are almost completely dominated by larger units (>100 employees).

Somewhat surprisingly, small companies account for a larger share of turnover than employment (see Table 1). However, when looking at export and investments, the impact of MSEs declines with firm size, with lower shares of exports and investments among MSEs. Nonetheless, the MSEs still constitutes a substantial share of the Danish economy.

There are no readily available data on the occupational safety and health (OSH) outcomes and performance in Danish MSEs. The main data source is the Danish Work Environment Authority's statistics on accidents and work-related injuries and diseases; however, this is not broken down according to firm size in the available data. Hence, it is beyond the scope of this report to say whether or not the OSH outcomes on accidents and injuries in Danish MSEs deviate much from the overall European averages for MSEs, but the general perspective is that the picture of higher rates of accidents in MSEs, found in previous research, is also confirmed in previous Danish studies (Sørensen et al., 2007).

Table 1: Micro and small enterprises in the Danish economy

	Number of employees		
	1-9	10-19	20-49
Percentage of overall employment (full-time employees)	14.1	7.1	9.5
Number of companies with employees	118,285	11,390	6,903
Percentage of overall turnover	15.4	7.7	11.4
Percentage of overall exports (2010 figures)	6.3	6.0	8.0
Percentage of overall investments	9.4	6.1	7.9

Source: Register-based data from Statistics Denmark, 2014 figures

2 Roles of social partners and authorities

The Danish labour market is characterised by the strong and central role played by the social partners. Hence, many labour market regulations, including wages and most working conditions, are determined in bipartite collective agreements between the social partners mainly at sector level, but typically with substantial local negotiations in the companies leading to local adaptations of the framework set in the collective agreements (Rasmussen et al., 2016). The social security benefits, which are determined by public regulation, are at comparatively high levels, which also has an impact on the wage level workers

will accept. The Danish state has a subordinate role in the labour market regulation, in particular regarding wages and working conditions, and there are not, for instance, any statutory minimum wages; these are entirely determined in the collective agreements between the social partners. But there are also areas where there is substantial legislation, OSH being one.

OSH is basically regulated through legislation, but influenced by the social partners through the national work environment council and in the bipartite sector councils on OSH within various sectors such as construction, manufacturing and public service, which were established after the 1975 law on the work environment (Jacobsen, 2011: 377-8). The details have been changed over time; the last change was in 2016, when the number was reduced from 14 to 5.

The Danish Labour Inspectorate under the Danish Working Environment Authority (WEA) has a key role in the Danish OSH system, carrying out — in comparative perspective — a rather high rate of inspections, but the WEA has also increasingly taken on a consultative role, providing more guidance, especially to MSEs, on OSH matters. There are also few elements included in the collective agreements, such as the advisory services in the construction sector; and working time, which has important implications for OSH, is, apart from the general EU regulation, regulated only through collective agreements.

▪ Are there any specific national policies for MSEs with an impact on OSH?

All Danish companies with more than nine employees are obliged to have an OSH committee consisting of an OSH representative and a management representative. So the micro-enterprises are exempted from the mandatory worker representation and from establishing an OSH committee. Nonetheless, the employer is still obliged to cooperate with the employees on ensuring a sound and healthy work environment. So, apart from these exceptions, the general rules and regulations apply to MSEs as well. As regards policies, the focus on MSEs is rather limited. These companies are mentioned in the national policy programme on the work environment (Hasle, Limborg et al., 2017) but with some, limited explicit activities. There are initiatives mainly aimed at improving the work environment in MSEs in the bipartite sector councils on OSH. In addition, there have been more explicit programmes such as the prevention packages (Hasle, Kvorning et al., 2012; Kvorning et al., 2015) which have been terminated.

▪ What kind of expertise and important intermediaries are available to MSEs regarding OSH issues? Coverage?

Denmark does not have a regulatory system requiring access to OSH advisory services. There are certified OSH private advisory companies, but, as full payment is required, they are used by MSEs to only a limited extent (Hasle, Møller et al., 2016; Kabel et al., 2007). Nevertheless MSEs buy service in order to ensure compliance with national regulation on, among other topics, risk assessment (known as workplace assessment in Denmark), but data on the coverage of these private firms are missing.

The bipartite sector councils on OSH (*Branchefællesskaber for Arbejdsmiljø*, BFAs) provide extensive web-based information services, and some of the information targets MSEs, in particular in sectors dominated by MSEs. The BFAs provide direct advice to companies to a limited extent, for instance in construction. So do employers' associations and unions. The Labour Inspectorate also offers some guidance, especially during its regular inspections but also through its website.

▪ General strategies that also reach out to MSEs

In general, Danish small enterprises are also covered by the OSH legislation that, for example, requires a written risk assessment and places the responsibility for a safe and sound work environment on the employers. This obviously has an impact on the MSEs, and so do the inspections by the Labour Inspectorate. The Danish Labour Inspectorate carried out a screening procedure between 2005 and 2012 whereby all Danish companies with employees were visited. In several case companies studied in

the previous phase of the project, labour inspections had led to changes or improvements in work environment (EU-OSHA, 2018b).

3 Design of the data collection

We followed the original research design proposed for this work package with three sector dialogue workshops (see EU-OSHA, 2017a). The social partners have an important role in the Danish labour market, as described above, and they have a significant impact on OSH at both company and sector levels. Much information on and development of OSH policies and the OSH impact of the social partners come through the BFAs, which have an important role in discussing, informing and developing OSH in the industries. We therefore used the BFAs¹ as the starting point for organising the Danish dialogue workshops, since the main idea of the design was to have a social dialogue among the various actors.

After an initial meeting with the social partners in the three corresponding BFAs, where the planning and content of the dialogue workshops was discussed, a date was set for a workshop in all three sectors included. While there was a sector council for manufacturing and one for construction, the BFA for hotels and restaurants covered the broader area of private services, so we included this somewhat broader sector perspective, which for example also includes cleaning, janitors and hairdressers. However, in the actual workshop in private service it was mainly hotels and restaurants that were emphasised, although several of the participants also had insights and experience from other service industries. The BFAs and the social partners that are represented in the BFAs provided important input and assistance when contacting the relevant actors from the social partners as well as suggesting other relevant actors to invite. Furthermore, the WEA, which is the national focal point for EU-OSHA, was contacted in order to help secure representatives from the WEA to be present in the workshops as representatives of the regulators group. The WEA was very accommodating and appointed inspectors with experience of inspecting MSEs in the relevant sectors to the dialogue workshops.

Although the cooperation with the BFAs and the WEA made it easier to recruit for the workshops, it still required a large effort to secure sufficient participation in all groups and sectors. We phoned numerous potential participants, utilising the network of the researchers involved as well as the contacts suggested by the other actors. Especially the OSH advisors required a large effort to convince them to participate in the dialogue workshops. Ultimately, we succeed in securing a satisfactory and representative number of participants from all four groups and from the three sectors (see appendix), except for OSH advisors in hotels and restaurants, of whom only two were present, and workers in manufacturing, of whom there were also only two because of late cancellations by the two other representatives who had signed up for the workshop. However, these were supplemented by two extra follow-up interviews (see the list of interviewees in the appendix), which substantiated the findings from the dialogue workshops. Overall, the participants in combination with the supplementary interviews provided a good and broad representation of the relevant actors in the Danish context.

Our aim was to invite participants with a high level of experience of working with OSH matters in MSEs. So, while we did invite numerous MSEs, including the ones participating in work package 2 (EU-OSHA, 2018b), and encouraged the social partners to invite company representatives, there were mainly experts, advisors and organisation representatives in the workshops. Since the actors present in the workshops in general had very broad and comprehensive knowledge, experience and insights on MSEs and OSH, the workshops provide many relevant results.

There may be some limitations of the findings in the current research, since the participants representing employers and workers in the dialogue workshops as well as the additional and follow-up interviews are all from the organised part of the Danish labour market. So their contact with unorganised MSEs is limited. By 'unorganised' we mean companies that are not members of an employers' association, are not covered by a collective agreement and have no or only very few unionised employees in the workforce. In the first report of the Sesame project (EU-OSHA, 2016), it was found that these

¹ When we conducted this part of the research in 2016 there were 11 of these.

‘unorganised’ firms are expected to perform below average in terms of OSH, and we would also make this assumption in Denmark, in particular for the hotels and restaurants, partly also because of the weaker regulation in this sector. While there are also unorganised companies in construction and manufacturing, they would typically be faced by demands more or less resembling the demands in organised companies, especially when there is a high demand for labour, which in general makes it difficult for the companies to have pay and working conditions below the level stipulated in the collective agreements, although there are exceptions to this (Rasmussen et al., 2016). Here hotels and restaurants appear to be somewhat different, at least when it comes to cleaning, dishwashing, reception work and so on, due to a high labour supply that increasingly consists of migrant workers and students (Ilsøe, 2016).

This limitation was addressed to varying degrees in the three dialogue workshops, so the participants were well aware of the potential limitation. The labour inspectors had significant experience with unorganised firms, but nevertheless the results in this report may reflect the more organised firms in the Danish labour market which could be expected to have better conditions than the unorganised firms. One of the five additional interviews was with a (former) labour inspector, who was part of a team in the WEA focusing on social dumping, which targeted only unorganised firms that tried to avoid or circumvent national regulations, such as collective agreements, tax payments and OSH regulation among others. So this interview also gave insights into the less organised part of the Danish labour market. We will also touch upon this question in the findings.

▪ Strategy for the analysis

For each dialogue workshop, the researchers took notes of each group discussion and the plenary discussions. Based on these notes, a final summary was produced and circulated to the participants in the dialogue workshop, and they were allowed to comment on the summary. The documents were also circulated among the researchers in order to verify and potentially clarify findings from the workshops. Furthermore, the five additional interviews and the two follow-up interviews were recorded and a summary was also written of each interview. This data were used for subsequently writing the final national report. In the national research team, consisting of four researchers, we had an analytical meeting to discuss the general findings of the current research and how to include these in the final national report. The report was also circulated among the research team for comments and editing so that we included the perspective of all the researchers who have been actively involved in the research. All in all, this should leave us with a coherent strategy for the analysis and provide a final national report reflecting the main findings from the research.

4 Role and function of intermediaries in OSH improvements in MSEs

In work package 2 in Denmark (EU-OSHA, 2018b), we found that only a minority of the MSEs have a proactive approach to the work environment and OSH, whereby the MSEs work actively on preventing accidents and OSH-related risks, especially the more subtle risks, and actively seek out information, solutions and technical improvements (this is also reflected in the European data in work package 2 (EU-OSHA, 2018a) and in previous research (Hasle, Limborg et al., 2012)). The impact of intermediaries in initiating improvements or even just compliance with existing regulation can therefore be very important for the MSEs’ actions (Olsen and Hasle, 2015) as indicated for example by the prevention packages (Hasle, Kvorning et al., 2012; Kvorning et al., 2015) and the company networks for improving working conditions in smaller breweries (Limborg and Grøn, 2014a). The potentially strong impact from intermediaries was also confirmed in the Danish dialogue workshops, where most of the participants pointed out that MSEs can be hard to motivate when it comes to OSH. Their intrinsic motivation to devote time and resources to OSH improvements is often limited, because the MSEs are occupied by their core business tasks rather than the accompanying auxiliary tasks such as OSH, which tend to be given a low priority (if any). The MSEs are typically reactive and have a short-term agenda of solving some currently

occurring OSH issues, which could be initiated by an accident, a warning from the labour inspection or a concrete OSH problem rather than long-term deliberate improvements in workplace safety, employees' health or the psychosocial work environment. Here the intermediaries in some instances work on motivating the MSEs to take a more active approach to their work environment and workplace OSH.

The Danish workshops also showed that the programmes and initiatives that were coordinated among the various actors, and where several intermediaries and actors have contributed with input and contributed to the dissemination and implementation of these initiatives in general, appeared to be effective in terms of improving OSH among MSEs. An example given in the dialogue workshop on private service was a coordinated effort towards hairdressers whereby the WEA increased the number of OSH inspections, which was backed by a set of prevention packages for the industry and was promoted by the social partners. The coordinated efforts were also given substantial attention in the dialogue workshop in construction. The participants highlighted the potential gains from more long-term cooperation among the relevant OSH actors in the industry, for instance through the sector council system, where there were several initiatives with long-term aims that were coordinated among the partners and also included the WEA and suppliers. The initiatives in construction included a general campaign to reduce the number of OSH accidents, which consisted of several smaller and minor initiatives. It also included unconventional OSH partners such as consulting engineers, architects and the association of building clients. Another construction example was a long-term effort to improve the working postures of bricklayers and reduce the strain from repetitive tasks, which was developed over almost a decade. While the bricklayer initiative was not planned as such, it was still carried out in a coordinated manner (Hasle et al., 2014).

The participants generally suggested that a coordinated or orchestrated OSH effort by the key actors can be an important way to reach out to MSEs and help them improve their daily work environment. Such a strategy of coordinated efforts among several stakeholders has grown into a key strategy in the Danish work environment policies during the last decade (Hasle, Limborg et al., 2017). This is particularly relevant when the social partners and the WEA agree on specific issues to focus on; for example, in the hairdressing industry there was a specific focus on improvement of hazardous work postures. This was reported to have a strong impact while the campaign lasted, although an interviewee from the hairdressers' employers' association indicated that once the campaign ended some of the small firms returned to their previous bad habits. One of the good examples in work package 3 (EU-OSHA, 2017b) from Denmark included a coordinated action between three public authorities (the Danish Tax Authority, the WEA and the Danish Veterinary and Food Administration, DVFA) targeted newly started restaurants; despite the initial success and a positive evaluation, this was not prolonged, partly because of difficulties in coordinating the effort between the authorities. So some of these coordinated efforts end or turn out to be ineffective for lack of coordination either between authorities or among the social partners, which shows that there can be quite high requirements for management of the coordination effort in order to create well-functioning coordinated initiatives.

Given the significance of the social partners in regulating the Danish labour market, OSH can in some instances risk being turned into an area of conflict between the social partners, rather than a topic for collaboration. Often when the local representatives from the unions and employers' associations get involved in an OSH issue, it has got out of hand at company level or there are some more serious safety or health violations, which the local or regional representatives are called in to help sort out. This can be a problem in the long run, if the MSEs experience the central organisations participating only when there is an OSH problem, rather than the social partner organisations being engaged in developing a healthier and safer work environment. Although both the unions and the employers' associations are engaged in preventive actions and campaigns, it was highlighted in all three workshops that their role in regulating OSH could be a problem because they tend to be involved only when there are problems or disagreements regarding OSH. The work environment is rarely given high priority in the collective agreements, so here the work environment can be somewhat stalled in the negotiation model. Nonetheless, when the social partners do include OSH measures and initiatives in the collective agreements, these can be very successful, as, for instance, the example of the advisory service BAMBUS in construction has shown. BAMBUS is a joint initiative within construction with a task force helping at company and construction site levels to improve and secure a better OSH setting (see EU-

OSHA, 2017b for a more detailed description of the example). BAMBUS has been initiated through the collective agreements in the construction sector.

An important element that surfaced in the workshop discussions was the need for the intermediaries to acknowledge and understand the MSEs and their needs in order to get them interested in OSH. As a participant from the Labour Inspectorate stated, 'you need to show genuine interest in their business and their needs'. If the intermediaries do so, it is much easier to get MSEs' attention when discussing OSH, since they can more easily relate to OSH as a part of the MSEs' business model. Furthermore, the intermediaries also need sector knowledge, otherwise can it be very difficult to get the MSEs to cooperate and take responsibility for OSH. The intermediaries are typically not considered serious by the MSEs if they do not display both knowledge and interest in the particularities of the sector. Showing interest and understanding is also important in order to meet the MSEs' demands for concrete and practical answers: Is it legal or not? What shall I do in order to solve the problem? References to general solutions or further studies of a problem are not considered relevant to MSEs.

The personalised contact with the MSEs was emphasised several times in the dialogue workshops and the subsequent interviews. It is perceived to be the ideal approach to MSEs, but often difficult in practice because of cost and organisational issues. When the intermediaries, for example the OSH advisors or the labour inspectors, are able to build a more long-term and personalised relation with the owner-managers, it is also much easier for them to address OSH topics and get the owner-managers interested. However, it is only in particular focused projects that the inspectors have an opportunity to pay more than one visit, and the MSEs will rarely be willing to pay for extended contact with the paid OSH advisors. For special services such as the construction advisory service BAMBUS, the possibility of building contacts exists, but the overall capacity to reach many MSEs in this way is limited. Individual personalised visits can also make a great difference. Just one visit in person to the company and its production sites (whether these are stationary or changing) can really help with OSH improvements and get the MSEs to discuss the work environment. The site visits make it much more accessible and less abstract for the MSEs to discuss OSH improvements. Often an experienced intermediary actor such as an OSH advisor or an employers' association representative can easily spot some of the problem areas and settings in the MSEs, so the on-site visits can be a very powerful tool in improving the work environment in MSEs.

By and large, the workshops showed how the intermediaries can have an important role in affecting and upgrading the OSH setting in the MSEs. This can be by locating OSH problems, guiding the MSEs and helping increase the awareness of OSH, obviously more so if the main topic of the intermediaries is OSH, for instance labour inspections or the BAMBUS organisation in construction. But, as the example of the coordinated inspections between the DVFA, the Danish Tax Authority and the WEA shows, other types of visits or inspections that also highlight OSH can have a positive impact by increasing awareness and attention to OSH.

Unconventional intermediaries are the suppliers of equipment and materials for the sector. Especially in the construction workshop, but also in the other two workshops, suppliers were pointed out as important intermediaries. It is an explicit strategy in construction to use suppliers, especially of OSH-friendly equipment such as lifting aids, as key disseminators of OSH information. Both the construction BFA and BAMBUS promoted OSH-friendly equipment and referred to suppliers who would be willing to demonstrate the equipment at the construction sites. The sector council also has projects together with suppliers, which aim to produce new equipment that would improve OSH as well as to deliver materials in less heavy bags or in bags that are easier to handle. It was agreed in all dialogue workshops that including suppliers more in OSH improvements is a strategy that could be further utilised.

4.1 Employers' associations

The employers' associations often act as counsellors and give the MSEs advice on OSH matters. But the MSEs typically contact the employers' associations only when they have some concrete problems they need help with sorting out. When the MSEs consult the employers' associations, they typically want an answer straight away. It is often grounded in the MSEs having difficulties in understanding the

legislative requirements or having a practical OSH problem they cannot solve themselves such as a notice from the WEA. The employers' associations reported in the dialogue workshops that they often act as a sort of 'translator' helping the MSEs to understand their obligations or what to improve if they have an improvement notification from the WEA. All the employers' associations indicated that in their contact with the MSEs they would stress the importance of ensuring a good work environment and of complying with the legislation. It is not the practice of the employers' associations to indicate to the MSE members that the work environment and the legislation are a waste of time.

This again indicates the mainly reactive approach of the MSEs, as they contact the employers' associations only once the problem occurs, and not in order to get ideas for improvements or investments in their work environment. However, it does happen that MSEs ask the employers' associations to come and visit their company to get help and suggestions for improvements in the daily work environment, but, even though the representatives from the employers' associations said that they enjoy making these visits, their capacity to do so is quite limited. In the dialogue workshops, it was highlighted by several representatives from the employers' associations that they often have to tell the MSEs that they actually have the OSH responsibility as employer and that it is their responsibility that the employees follow the OSH rules and regulation. Often the owner-managers in the MSEs will claim that they have bought the necessary protective equipment and have instructed the employees how to use it, so there is no more they can do, and they thereby leave the responsibility with the employees even though the work environment legislation clearly states that it is the employer's responsibility.

The employers' associations are also involved in various campaigns, which include regional public meetings with their members (the companies). It is, however, quite rare for the meetings to include only OSH topics, and typically other topics are more prominent in these meetings, but in some cases the employers' associations manage to get the MSEs engaged in pure OSH meetings. One example is within manufacturing, where there have been information meetings on OSH organised jointly by the employers' associations and the unions, and both parties agreed that these meetings, which were very practical and solution focused, were rather successful. An important element in such an approach is to show the MSEs as well as other companies that OSH is not an area of conflict between the social partners per se. Another key contribution of the Danish employers' associations is concentrated on their participation in the BFA, in particular when it comes to the information materials and campaigns. The employers' association in hairdressing has, for instance, introduced a so-called master craftsmen's diploma whereby hairdressers can earn the title of 'master of the trade' from the employers' association. In order to receive the title, they need to complete courses in general management, marketing, economics and OSH management. In this way, the employers' association has helped to increase awareness of OSH matters.

Networks, where experiences and knowledge are shared between employers, can have a positive effect, since it increases the attention and commitment of the MSEs, in particular when the networks focus on some specific changes such as introducing new technology, as was the case in a network for small dairy companies. It is mainly useful in sectors with many small companies. In construction, there are local craft associations, and similar ones exist for micro-breweries and smaller dairies (Limborg and Grøn, 2014b).

4.2 Trade unions

An important task for the unions as an intermediary in terms of OSH and MSEs is their active participation in the BFA system, which has an essential role in the Danish regulation of OSH. The BFA system is where many of the sector-specific information materials, campaigns and initiatives are developed, and the sector-based unions have an important role in contributing to this development. OSH is furthermore occasionally addressed specifically in the collective agreements, in which various OSH issues have been included to varying degrees. One successful example of an initiative that originates in the collective agreements is the BAMBUS initiative described above.

The Danish unions also have an important labour market role of local workplace representation of workers. In Denmark there are shop stewards and OSH representatives at the workplace level, although

this is more developed in the larger companies than in smaller companies (Rasmussen et al., 2016). These are typically (but not always) union members, and the unions organise training and networks. There is, for instance, a network for OSH representatives in construction based on online platforms where the OSH representatives can exchange information and experiences. Some of the unions also have newsletters and other information sources where they provide OSH representatives with OSH information. The unions in general also provide counselling and support for OSH representatives. The unions provide training for OSH representatives, including the mandatory course for OSH representatives.

Like the employers' associations, the national or regional representatives from the trade unions tend to get involved at the company level only when there is a conflict, a problem or a serious accident. Therefore, it can be difficult for them to establish a good dialogue on OSH with the owner-managers (this was highlighted by the union representatives in construction, for example). So, rather than solving the issues in a consensual way, it sometimes turns into a conflict between the MSE and the union. One important type of conflict can be about compensation for accidents and diseases, where the employee supported by the union demands compensation and the employer refuses the claim, because he or she believes that everything has been done to protect the employee and it was the employee's own fault. Another type of conflict could be about work environment measures in the workplace, for instance whether the employees should manually carry elements for installation or they should have aids for this. However, there were also examples of OSH dialogue that started out with a conflict, but then later led to better cooperation on OSH issues between the union and the company. In these cases, the unions mainly emphasised counselling their members in the disputes.

The discussion of OSH matters sometimes turn somewhat adversarial rather than proactive at the company level, but also among the social partners. This indicates the potentially problematic position of OSH in the Danish industrial relations model (Busck, 2014), but the social partners are, as described above, also actively engaged in other, more long-term, developments and improvements in the work environment in Danish companies.

4.3 OSH regulators

In Denmark, the chief regulatory intermediaries for the MSEs are the labour inspectors from the WEA. The OSH inspections by the WEA in Denmark deal with only health and safety. They do not inspect wages or working conditions, since these are regulated in the collective agreements and are therefore left for the social partners — mainly the unions — to enforce. The inspections by the WEA often serve in the Danish context as a door opener to the companies, in particular MSEs, in terms of discussing OSH with the owner-managers. The inspections can also pave the way for other intermediaries, when it comes to OSH. If an MSE in construction gets a notification from the WEA that it has to improve some issues, then the MSE will potentially seek help from some of the other intermediaries. This can be about a specific solution to the problem or more general counselling on solving the problem from suppliers, employers' associations and OSH advisors.

There was a general consensus in the dialogue workshops that the OSH inspections constitute a crucial foundation for the MSEs' attention towards the work environment, and the MSEs are worried about the inspectors sanctioning them or giving notices for improvement of work environment. This can, in turn, make them improve certain issues, which they would not have done otherwise.

It was emphasised more or less unanimously in the dialogue workshops that, in order for the inspections to have a more preventive and long-term impact, the inspectors need to be attentive to the everyday setting and needs of the MSEs. A strong coercive control approach without respect for and interest in the MSEs just creates conflict and resistance from the MSEs. Hence, it is important that the inspectors take a somewhat pragmatic approach within the framework set by the regulation. Some inspectors highlighted that they tried to appeal to owner-managers' own perception of workplace safety as much as to the formal requirements, for example in cases of physically demanding jobs by asking if the owner-managers expected that they would be able to work until they were 70 years old or by highlighting potential losses for their families if something happened to them at work.

An additional interview was conducted with an inspector from the DVFA, who does food safety inspections. As part of a pilot project aimed at newly started restaurants and food sales companies, the DVFA also provided extra information during the food inspections on tax and OSH issues (see also description in EU-OSHA, 2017b). It was her experience that the MSEs were quite happy to receive this kind of information. The MSEs do not necessarily make the same distinction between authorities (tax, food safety or OSH) as the authorities themselves do, according to the interviewee as well as many of the participants in the workshops. An example provided by the interviewee from the DVFA was that the MSEs would register with the tax authorities when they started up a new restaurant, but the MSEs are also supposed to register with the DVFA, as the information is not automatically transferred from the tax authorities to the DVFA. Such a division between authorities was difficult to understand for the MSEs.

A good example from a previous project was highlighted in the dialogue workshop on private services. In the project, the WEA actively sought out bouncers in bars and discotheques to discuss their work environment with them. The WEA inspector had good experiences from this approach. But the WEA does not have funding for this type of effort any more, and the WEA did generally not emphasise social relations with the owner-managers and workers. This was experienced by the inspectors as a limitation for successful inspections of MSEs. It was also pointed out in several workshops that the WEA has had some significant cuts in its budget in recent years, which has affected the quality and number of inspections.

4.4 OSH professionals

The OSH professionals were of two types: advisory services organised as a private business and certified by the WEA, and the BAMBUS advisory service organised by agreement between the social partners. The private advisory services highlighted that they often face economic restrictions when working with the MSEs, since there is no free-of-charge OSH service in Denmark (Hasle, Møller et al., 2016). They try to offer their product (supervision/guidance) at what — at least in some examples — can be considered a low price, but the MSEs tend to not buy OSH services from an external supplier. It is unlike the practice with book keeping, where it is much more common to use an accountant. However, we did encounter some MSEs in the hotels and restaurant industry that used OSH advisory companies, for example to help fill out the written risk assessment and other administrative tasks related to OSH. In one of the additional interviews with an OSH advisory company, the advisor interviewed also reported that it has some MSEs as customers, and several of the OSH advisors participating in workshops also had MSEs as clients. But all of the OSH professionals reported that they had lost many MSEs as customers once the previous mandatory OSH-counselling regulation was made voluntary (Kabel et al., 2007). The WEA can impose compulsory OSH counselling on companies, if they encounter an OSH problem the company may face difficulties in solving. In some cases, this produced some positive outcomes and a good progress, while in other cases the company was somewhat reluctant to cooperate with the OSH advisors when they were imposed by the WEA.

The OSH professionals can, as outsiders, offer expert advice and give the MSEs new perspectives on the potential risks and hazards in the companies. But, as highlighted by some of the OSH professionals, they also have to be a bit careful, since they do not want to lose the MSEs as customers by imposing too many costs and restrictions on the companies. So in some cases they use the OSH inspectors as a deterrent, since the owner-managers do not want notifications or fines from the labour inspectors. The OSH professional emphasised the need to build a long-term relation with MSEs in order to get into a position to suggest substantial improvements in their work environment. When the advisors know the company and the business, it is much easier for them to engage in development of the work environment beyond minimal compliance, but some of the OSH professionals found that the MSEs mainly use their services to ensure minimal compliance with regulation and avoid problems with the OSH inspections.

4.5 Other intermediaries

Because of their large number, MSEs can be hard to reach for the authorities and other OSH intermediaries; therefore, unconventional intermediaries can serve as an alternative approach to reaching the MSEs. One pilot project documented such an example by using accountants to provide information about OSH (Hasle et al., 2010). Here we will briefly mention some of the other intermediaries discussed in the dialogue workshops and the follow-up interviews.

In the workshops and the additional interviews, the suppliers of machines, equipment and raw materials were assigned a rather prominent role as intermediaries that have a wide range of interactions with MSEs and can have an important impact on OSH in MSEs, not least in the construction sector, where several of the supplier companies also participated in the dialogue workshop. The suppliers deliver many tools, machines and pieces of equipment that can affect OSH in MSEs significantly, not only in construction but also in private service and manufacturing. These cover a broad range from detergents to ladders and from hammers to heavy machinery.

In the construction sector, the supplier companies have the role of advising the MSEs on buying and using technical aids, so the BFA in construction has emphasised active cooperation with the suppliers, for example on eliminating the use of single ladders, which are much more prone to OSH accidents than platform ladders. The BFA in construction has actively been seeking to include areas where the suppliers could take on an active role in eliminating less safe solutions from the suppliers' catalogues.

In the auto repair industry, the industry association had a good cooperation with some suppliers. They had a joint project on developing a new wagon to reduce the number of heavy lifts. Another promising example of suppliers developing new tools is also from the auto repair industry. Here an online platform has been developed, where the repair shops can manage their chemical and waste handling and equipment checks, as well as OSH, through checklists for auto repair shops and the written risk assessment. These different tasks have all been integrated into same system, which has just been released, and the feedback from MSEs has been very positive so far.

Several of the supplier companies would like to see themselves taking on a more active role in terms of delivering better and safer equipment, but also developing new solutions that are safer and less strenuous for the workers. This could add a dimension to their businesses of being able to guide the companies on these matters, which could also potentially increase their sales. Some of the participating supplier companies had trained their sales personnel in giving OSH guidance to the MSEs. As stated by a supplier, 'All carpenters need a hammer'. Therefore, the supplier companies have a lot of interaction with MSEs and can thus serve as a good entrance point for improving OSH matters. Nevertheless, there may be some inherent tensions, since the suppliers ultimately also have the goal of selling products, which may blur the quality of the guidance given to the MSEs. The construction BFA therefore lists equipment on its website only when it is recommended by independent parties such as individual craftsmen, construction companies or OSH advisors.

An interviewee from the employers' association for hairdressers and cosmetics reported in an additional interview that it has had some helpful discussions with the suppliers. In particular, one specialised supplier took an interest and got involved in improving, among other things, protective gloves and the size of detergent packages. But then, when it comes to the larger suppliers of cosmetic and hair dye, it is very difficult for a small employers' association to affect the supply chain, because these large companies are very large multinational actors (for example L'Oréal); however, the association is part of a European organisation where it is easier for them to affect the overall agenda. The union also cooperated with suppliers in hotels and restaurants to improve the tools and gloves used for cleaning. The private service employers' association had also cooperated with accountants who were also to provide OSH advice and consultancy, but the accountants did not in the end have enough interest in OSH as part of their business model.

While not being a separate intermediary as such, the BFA system was highlighted in all three workshops (perhaps not surprisingly, since many of the participants are aligned with the BFAs). Several of the participants in the workshops stated that the OSH information available via the BFAs and in particular their websites was found to be highly useful for the MSEs. Basically all the OSH information needed is

available; however, the MSEs need awareness of where they can find the information and how they can use it in practice. The BFA system has also initiated improved relations between the social partners. It was generally reflected in the workshops, where most of the organisations' representatives had good social relations and the tone seemed rather jovial.

Finally, the importance of OSH support to newly started entrepreneurs was mentioned in the workshops. The WEA has made an agreement with the Danish Business Authority about providing basic OSH information to entrepreneurs when they start hiring employees, but the information is limited to the requirement for risk assessment and the duties of the employer. The participants in the workshops pointed out that this kind of support could be extended to the business advisory services provided to entrepreneurs by, among others, the Danish municipalities.

5 Barriers and enablers for intermediaries for preventive activities in the MSEs

In the attempt to improve the work environment in MSEs, the intermediaries face a range of barriers as well as some enablers (as identified in the previous phases of the project (EU-OSHA 2016; EU-OSHA 2018a)). In this section we discuss barriers and enablers in more detail as they appeared in the data collected during the dialogue workshops and the follow-up interviews.

The main constraint is identified in the overall SESAME project as the limited resources of the MSEs, both economic and managerial, and the limited access of the intermediaries to the MSEs (EU-OSHA, 2016). These were consistently highlighted in the workshops as well as in the follow-up interviews as the main barriers for improving the work environment and the OSH management in MSEs. It is difficult for the intermediaries to get the MSEs to prioritise OSH improvements. The MSEs in general focus on performing their core business functions rather than on administrative and auxiliary tasks such as OSH, which in turn leads to short-term ad hoc actions. OSH is not considered to be part of long-term upgrading or investments in their business model. In both construction and manufacturing, some of the tools and machinery for reducing heavy lifting, for example, are relatively expensive, so the MSEs are not in an economic position where they can (or will) make the investment. Furthermore, they often also lack knowledge about what particular technical solution they should invest in, even in cases where the investment in the technical equipment can be an economic advantage.

It is in general difficult for the OSH intermediaries to reach out to the MSEs. MSEs rarely seek out help or information by themselves. The exception is when they face a specific problem such as an accident or an improvement notice from the labour inspectors. The intermediaries are also restricted in the channels through which they can reach the MSEs; the labour market organisations mainly reach (and prioritise) the organised companies, and often they get involved only when there are some local OSH problems, and the OSH advisors are often faced with economic constraints, because the MSEs will not prioritise paying for their service.

The MSEs generally have a low level of knowledge about the formal OSH obligations and regulation, but also often about the actual workplace risks as well as the potential OSH improvements. As an example, some of the employers' representatives spoke of owner-managers in MSEs who stated 'we do not have a psychosocial work environment'. These limitations are further reinforced by OSH regulation, which appears complex and is written in technical terms, which do not make sense to the MSEs and demand resources for the MSEs to break the code. This is an example where the intermediaries can have a role of interpreter of the information for the MSEs. An interviewee (from an industry association) gave an example from the time when she was working in a small auto repair shop. They were introduced to the prevention packages, but at that time they seemed to be too complex and bureaucratic even for her, so the suggestion of applying for a prevention package ended up at the bottom of the to-do list and ultimately got dropped by the company. But later she started working for the industry association and quickly learned that it was actually simple to apply for a package. It just seemed like a big task when they had many other administrative tasks to keep up with, and the consequence was that no action was taken.

5.1 Enablers

A way to reach MSEs with an OSH agenda, which was highlighted in many of the workshop discussions, is through apprentices, especially when they are in the vocational schools. If OSH rules, planning and implementation of improvement are part of their education, they carry the increased OSH knowledge out into the workplace and hence into the MSEs. The younger generation of craftspeople may not be able to change the culture among the older generations, but they will change some things and they will also eventually replace the older generations at some point in time. It was also highlighted, especially in the construction dialogue workshop, but also in the interviews with representatives from the auto repair shops, that younger craftspeople who are starting their own (small and micro-) businesses now are more aware of OSH issues than people in the businesses owned by older owner-managers.

When the intermediaries are offering a concrete product or project, this can affect the dialogue and cooperation with the MSEs and raise their awareness of OSH matters. Tacked on to the prevention packages developed for the auto repair sector, the industry association offered informal guidance on how to apply for and subsequently implement the packages. It worked well in this industry and is a prime example of the intermediaries offering the MSEs a concrete project and solution to practical problems that they could recognise as relevant to them. The prevention packages had a positive impact in raising OSH awareness and standards in the auto repair industry and also reached a high number of companies.

Another element often highlighted in the workshops and the interviews is the importance of the personal contact between the intermediary and the MSE, especially the owner-manager. In cases where it is possible for the intermediaries to build a personalised relation over time with the owner-manager, it is much easier for them to contribute to improvements in the daily organisation of the company, since the intermediaries get a better idea of the needs of the MSE and the dialogue becomes more open. An example was given by the interviewee from the auto repair association, where the fact that the consultant himself had a background as a car mechanic made the dialogue much easier, since he was considered one of their own. However, the cost of developing such a close contact limits the possibility of doing so.

Other potential enablers that were highlighted included the new social media, mainly online platforms, where the intermediaries have easier means of communicating with the MSEs and with employees in the MSEs. Suppliers were also emphasised as a way to improve OSH in MSEs, both through improved equipment and through OSH guidance from the suppliers. For instance, in construction the BFA had worked intensively with the suppliers to improve the available solutions and to give the suppliers some basic information they could share with the MSEs.

5.2 Sector-specific experiences of the intermediaries

Although there are many OSH problems and barriers that are the same across all MSEs, there is also significant sector variation across the three sectors investigated in the dialogue workshops and the interviews, as well as between subsectors within the same broad industry. For instance, the OSH issues in hairdressers diverge significantly from the problems in restaurants. Here we will address some of the sector-specific barriers and settings with impacts on OSH in the companies and the intermediaries' possibilities of addressing these. However, a general finding is that, the more sector-specific knowledge the intermediaries have (not only on OSH, but also on the general conditions and challenges in the sectors), the easier is it for them to engage in meaningful dialogue with the MSEs. This was the case for all the different intermediaries.

The economic development in the industries also has an impact on the work environment and on how the OSH procedures are handled. In the manufacturing workshop it was mentioned how some subsectors (such as pine furniture and micro-breweries) grew rapidly, which made it hard to adjust the OSH settings in the industry, because the companies were constantly expanding and hiring people, and hence did not find (or take) the time to consider OSH issues. The development would be different in the subsectors with a more organic growth model.

5.2.1 Construction

In the construction dialogue workshop, the issue of subcontracting and fragmenting the value chain was given some attention. This means frequently changing worksites and work organisation, especially for the MSEs, compared with both manufacturing and private services. The main contractors subcontract tasks to a large extent, and the low-paid and less value-adding tasks often end up with the smaller companies (see also the discussion below). The fragmentation can also make it more difficult to coordinate OSH on a construction site when there are many small subcontractors and some of them may be present for only a few hours a day. Construction is marked by ever-changing work as the building process develops and as the companies and workers frequently change construction sites. This particularity of the sector makes planning and coordination more important but also more difficult. The companies and the workers may also work in conditions that are determined by other companies, for example painters working after the carpenters, so if the carpenters have not done a good enough job on cleaning or if they have not completed their work it affects the other groups. It often happens that there are several groups of craftsmen working on the same site at the same time, which may further complicate the coordination process and increase risk. It also opens up a good opportunity for exchange of experiences across firms and workers, because the companies are working close to colleagues.

In the construction dialogue workshop, it was also highlighted how the MSEs mainly stress the risk of accidents rather than musculoskeletal diseases, since these direct risks are much easier to acknowledge and address than the more invisible risks. In addition, some of the technical solutions presented at sector level were not very well suited for solving the problems. As an example, a 'paint giraffe' was mentioned. This is a device that helps paint ceilings without the painter needing to stretch his or her arms up high in order to reach the ceiling. However, there were problems in the construction industry with moving it around, due to the construction in progress on the floor and due to bad housekeeping, which often made it difficult to use this potentially very helpful piece of equipment.

There are an increasing number of foreign workers in construction (but also in cleaning, hotels and restaurants), which can lead to certain problems. Many of them do not speak Danish, which can be a problem in terms of safety instructions or if an accident happens, but also in daily communication with intermediaries such as the labour inspectors or OSH advisors performing tasks for the companies. Finally, the BAMBUS initiative (see also EU-OSHA, 2017b) was highlighted as a successful initiative with a positive impact in the construction industry.

5.2.2 Manufacturing

The permanent character of the workplace setting in manufacturing compared with construction makes it easier to address many health and safety aspects of production. Nonetheless, there are also work environment problems in the manufacturing industry, and these vary across subsectors. A specific tool, which was referred to as helpful in many manufacture settings, is the so-called board meetings (*tavlemøder*) inspired by lean manufacturing (Hasle, Bojesen et al., 2012; Womack and Jones, 1996), whereby managers and workers meet around a whiteboard with specified production data to plan the production and address potential challenges in the production line. These meetings often also address OSH-related issues, so they can help connect OSH, productivity and tools for improving productivity, sometimes also with the help of other lean tools. Such methods are often used in larger companies, but it was pointed out at the workshop that many smaller production companies have started to use board meetings as part of their operational practice.

The networks among owner-managers that were highlighted in the workshops were mainly found within manufacturing. There were examples of owner-managers discussing specific OSH changes in micro-breweries and dairy firms (Limborg and Grøn, 2014b), as well as more informal networks, for example for auto repair shop owners, which also led to OSH learning across the companies, and hence improved OSH outcomes.

The social partners referred to one successful strategy which they had now applied in the BFA setting. Each winter they jointly organise a series of local meetings where they present new information about

OSH in the metal industry. The meetings have a high attendance and are appreciated by both managers and workers in the industry. They do not only target MSEs, but in practice most of the participants come from the small companies in the sector; perhaps the bigger companies do not need the same type of information.

One specific issue that was raised in the dialogue workshops is how to get the companies in the industry to actually apply the knowledge and information that is already available. The participants in the manufacturing workshops agreed that both the knowledge and the technology are available to handle and solve the majority of OSH issues. It was emphasised that the workers in manufacturing do not use a smartphone as part of their daily equipment, unlike in construction, where the workers need a phone for the company to get in touch with them about logistics and tasks. This makes the apps and videos on the smartphone a good source of information in construction, but not in manufacturing, since the workers do not use the phone as a tool in their daily work in the same way.

5.2.3 Hotels and restaurants

This sector is characterised by high mobility of staff and short lifespan of companies combined with a relatively low level of organisation. Fewer employees are union members and fewer of the companies are members of an employers' association than in other sectors in Denmark. That restricts the scope and space for action of the social partners. Unorganised companies are more difficult to address, since they do not have the employers' association as a channel for communicating OSH issues, among other reasons. The BFA for service industries does produce extensive information for this sector, and the information is actively promoted by the social partners, but not all information reaches the relevant actors.

The OSH improvement efforts are furthermore hampered by a high share of workers with no formal education, many foreign and young workers, and much part-time and temporary employment. It is also a sector known for a relatively high share of informal work without tax payment and work permits. There are an increasing number of foreign workers unable to speak Danish employed on these insecure conditions, which can make it more difficult to develop the work environment. Among the owner-managers, there is also a significant share with a non-Danish background (in particular in restaurants, pizzerias and so on), and especially the smaller restaurants with foreign owners appear to be more prone to problem working conditions, among other reasons because they have bad economic conditions and low profit rates, which can result in the work environment not being prioritised. There has been a strong growth in part-time employment in these sectors (Ilsøe, 2016), which may have negative implications for OSH, since these workers are present at the worksites for shorter spells and are more difficult for intermediaries to reach. A significant share of the part-time workers are students (Ilsøe, 2016), who may be less inclined to address OSH issues, since their employment is of a more temporary character.

It is important to integrate OSH solutions and improvements in the work environment into the daily operations of the companies rather than trying to advocate them as separate activities. While this was also mentioned in other sectors, it was highlighted specifically in the dialogue workshops on hotels and restaurants. Some of the social partners emphasised integrating the work environment into the professional ethics of being a good chef or a good waiter, and they believed that it would be an important strategy in the future, but the progress so far has been limited because of limited resources.

A final point discussed at the workshop was violations of OSH regulations by the employees. Both the employers' association and the unions agreed that the owner-managers can and should in some cases give warnings to employees who are not following the rules, so that they understand the importance of them. This would enforce the owners' OSH responsibility and increase the OSH awareness in the industry.

5.3 Company-level specific experiences of the intermediaries

Company size was emphasised almost unanimously in all the workshops. The micro-companies (typically with fewer than 10 employees), which do not have a full-time manager in the organisation, in general face much bigger problems in organising and carrying out OSH preventive activities as well as risk assessments and other mandatory and voluntary measures in relation to their work environment. Once the companies reach a size where they need to have a management structure with various functions delegated to people other than owner-managers, the work environment is quite often handled by this managerial level or delegated to others. The smaller companies also rarely have funds set aside for OSH measures or OSH advisory services such as the large firms may have. However, it differs significantly between companies and industries when the MSEs reach a size where they need a more comprehensive management structure that can handle OSH matters. Obviously, the presence of a management structure is not per se sufficient for the MSEs to be able to better handle OSH, but the difference in the magnitude of the problems between micro- and small companies was emphasised more or less unanimously.

It was also agreed that OSH results in MSEs, especially the micro-companies, are more dependent on the personal engagement of employees and owner-managers, since OSH settings are less institutionalised. If the owner-manager or an employee, for example an OSH representative, takes a special interest in OSH, it is typically much easier for the intermediaries to get access and be involved in supporting the companies. Other owner-managers, who do not take that interest in it, do not believe they have any issues at all regarding the work environment. They typically stress that they have never had any OSH problems or accidents; hence they have a good work environment.

5.4 Intermediary specific

Obviously there are very different barriers and enablers depending on the position of the intermediary that is approaching the MSEs; most of these are discussed above in section 4. The suppliers may be able to address very different issues from unions or employers, which again have a different level of access and type of approach from labour inspectors and advisors. When these different actors address OSH issues in the MSEs from different angles with somewhat similar messages, this can strengthen the effort and help convince the MSEs to take action. An example could be the labour inspectors pointing to a problem in a company, where the employers' association or the OSH advisors can suggest a solution that the suppliers are able to deliver. If the intermediaries coordinate their efforts and approaches, this can result in a joint strategy, as the examples of cooperation in the construction BFA have shown. Here the social partners in the BFA have coordinated their strategy with the WEA and several suppliers.

One significant difference between the intermediaries in their relationship with the MSEs is whether they are selling a product, as the OSH advisors and OSH suppliers are, in a regulatory relationship, as the labour inspectors are, or based on voluntary memberships. Both the employers' associations and the unions highlighted that their position was different, since they are not selling any products but they still need to secure either the worker's or the company's continued membership of their organisation, which means they need to probe how to be useful for their members. The result may be an employers' association being a bit careful about its potential criticism of, for instance, lack of OSH actions by the employer, or the unions fighting for members' rights even in cases where the member in some way or the other has misbehaved. Here BAMBUS could be highlighted, since it is in a special position, where it is not selling any further services, and the companies have already paid through the collective agreements, which increases their motivation to accept this particular advisory service.

The intermediaries face the problem that the companies that seek out help by themselves are typically the companies that already have more focus on OSH than average. It is therefore a general problem to reach all the MSEs that are less interested in or attentive towards OSH than the average firm. The labour inspectors from the WEA are the principal actor in terms of addressing the companies that are not actively seeking out information themselves, and inspections have an important role in relation to that segment of the MSEs. The suppliers are also in touch with these companies, but they may have more

difficulty in convincing them to purchase more advanced and safer tools and equipment, which are often more costly.

5.5 Contextual factors

It was often suggested that companies with a low profit margin and at the lower end of the value chain (with many low value-added tasks) are more exposed to a poor work environment. This suggestion was in particular highlighted in the construction workshop, but also raised regarding hotels and restaurants. Both sectors have many migrant workers who have lower levels of knowledge about OSH and the Danish labour market in general. This experience was also emphasised in the interview with a (former) labour inspector who had experience from a special task force in the WEA against social dumping. This WEA task force conducts coordinated inspections in which labour inspectors from the WEA work closely together with the police and tax authorities in inspections targeting companies that are suspected of breaching regulations in the different authorities' spheres.

5.5.1 Target groups: which can be reached and which cannot?

The discussion of the possibilities of reaching various segments of MSEs showed significant variation, reflecting the characteristics of the different intermediaries as discussed above. But again the problem of self-selection of the most motivated MSEs was strongly emphasised. The majority of MSEs do not prioritise OSH issues, and these are the most difficult group to reach for the intermediaries. While the social partners mainly reach the organised parts of the labour market, in particular the labour inspectors are fundamental in reaching the unorganised companies. The MSEs that are not motivated to engage in OSH improvements or do not prioritise OSH are therefore a very important target group for the labour inspectors. The labour inspections are by and large the only intermediary which can reach this particular target group, but the restricted resources of the WEA are a serious constraint. The budget for the WEA has been cut and the MSEs are often inspected only at intervals of years, but the WEA ensures at least some minimal compliance among the group of MSEs with a low degree of OSH motivation.

5.6 Identified shared understandings as well as divergences among the stakeholder groups

In the dialogue workshops, the stakeholder groups and intermediaries in general agreed on most of the barriers and enablers identified for the MSEs, as well as for the roles and strategies of the intermediaries. There was, in particular, consensus about the point that MSEs are a group of companies that have special OSH needs and therefore require a special approach. There was also a consensus on the difficulties in reaching the MSEs, in particular in the micro segment. They are hard to reach and to get engaged in OSH initiatives. But differences in opinions also appeared at the dialogue workshops, both on what are the most important aspects of OSH in MSEs and on how to improve this, but these differences were to some extent just as interpersonal as they were interorganisational. Several of the participants in the dialogue workshops also had experience of working in other OSH intermediary organisations. Labour inspectors had earlier experience as OSH advisors, and OSH professionals employed by both employers' associations and unions had former positions as labour inspectors and OSH advisors. This fact probably supported the consensus, since these actors have a better understanding of the position of the other actors.

The intermediaries agreed that the MSEs need special attention and they agreed on the approaches currently taken towards the MSEs. The current OSH system and policy efforts have very broad support from all partners and participants in the dialogue workshops. The existence of the BFA system is one important explanation for the broad shared agreement. The system supports a consensual, sector-based approach to the work environment in Denmark because, among other reasons, there needs to be agreement about activities in order release money in the system. While there was consensus, in general in the dialogue workshops, about the general approach to MSEs, most intermediaries pointed out the

lack of resources to reach the full population of MSEs. However, there were some conflicting viewpoints on the need for labour inspections and for the extent of these inspections. The employers' associations in general favoured a more voluntarist and information-based approach, while the unions on average would like more control mechanisms. The same was also partly the case for OSH regulation, where some of the unions in particular wanted more regulation, of which the employers' association in general were not in favour. In addition, the unions had a more negative picture and understanding of the willingness of the MSEs to improve conditions, when they were explicitly addressed. However, this may be because the unions typically get involved at workplace level only when a member contacts them about problems or because they observe problems when they are present at the worksites.

These findings were somewhat consistent across the three sectors, with some nuances, such as the actors in hotels and restaurants paying more attention to where they disagreed, while this was less so in construction. Cooperation among the actors is more advanced in construction, in particular in the BFA system, than in hotels and restaurants or in private service, which may explain a more consensual approach among the actors in construction. The fact that hotels and restaurants and private service have lower organisation rates and hence weaker organisations is most likely also to have an impact on the outcome.

5.6.1 Motivations and implications

The participants in the workshops and the interviews generally share the understanding that the MSEs would like to improve their work environment and working conditions. Unsuccessful attempts to ensure a safe work environment are due not to bad intentions, but rather to a lack of managerial and economic resources, which leads to low attention and hence limited knowledge on how to handle potential OSH problems.

The shared understanding of the OSH challenges in MSEs shows that the actors and not least the social partners can have a central role in addressing these issues, since there is actually more they can agree on than they disagree upon. This provides a strong basis for having a closer and more collaborative approach to OSH in MSEs, which in Denmark is facilitated in the BFA system. Here various campaigns and joint initiatives are coordinated, and the social partners get a better understanding of each other's position. This was to some extent reflected in the more consensual tone among the participants in the dialogue workshop in construction, who also have a better established cooperation than in, for example, private service, where the social partners/intermediaries appear to have a less consensual understanding of OSH in MSEs and the other actors' position. All in all, while there is some fundamental disagreement on the extent of the inspection regulations, the participants in the dialogue workshops all acknowledged and contributed to the development of the existing framework rather than emphasising their disagreements, and it appears that daily cooperation is characterised (in all three sectors) mainly by consensus.

6 What works for whom — and why?

A tailored and personalised method was emphasised as the most important aspect of the intermediaries' approach to improving OSH in MSEs. Based on the roles of their organisation, they try to align the perception, needs and abilities of the owner-managers and employees in MSEs. They do so by their preparation of information, initiatives, tools, communication and programmes. There is therefore a strong need for sector-adjusted information, tools and interventions programmes in order to meet the needs of MSEs and their everyday life. This differs very much across sectors and companies although they share numerous challenges and characteristics. If for instance OSH information in construction is a 10-page instruction manual and many craftspeople prefer verbal to written communication, the information is not getting through to the relevant people in the industries. The intermediaries have to carefully design the programmes, approaches and initiatives, so the MSEs can identify with the content. If it becomes too abstract, the MSEs will typically lose interest. Being able to respond to the MSEs' needs when they occur is also important. Many of the participants in the dialogue workshops suggested that the 'window

of opportunity' is shorter than in larger companies, so it is important that the intermediaries are able to react to the needs of the MSEs as they occur'. The greatest impact of the intermediaries is found when they are able to help the MSEs on site with concrete solutions to their OSH problems. MSEs are action-oriented, and they need clear and practical answers to their questions. Here BAMBUS can be highlighted as an initiative that is well adapted to specific needs of MSEs.

What also is clear from the Danish data is that the labour inspections have a strong motivational impact on MSEs, in particular the companies that are most reluctant (or unable) to monitor and improve the work environment on their own. The comparatively high rate of OSH inspections in Denmark provides a minimum of compliance and facilitates increased attention to OSH, especially in the firms that have few (or no) incentives for improving or paying attention to the work environment. In the companies that are not motivated to prioritise OSH, the other intermediaries often use the labour inspections as a benchmark and also partly a deterrent. It is for instance helpful for employers' association, unions and OSH advisors that they can tell the owner-managers they need to live up to certain OSH standards because of the demands of the WEA. So the labour inspections thus become the platform that many of the other intermediaries are building on in their interaction with the MSEs. But the labour inspectors only rarely visit the MSEs and typically at intervals of several years, especially if there are no remarks from the previous inspection. So the labour inspectors may not get the full picture of the work environment in the company. Some of the intermediaries in construction (BAMBUS) said that they often come after an inspection from the WEA, and they regularly observe something different from the WEA.

What also appears successful in breadth and scope for the intermediaries' contact and interaction with the MSEs is integrated approaches where the different intermediaries support the same message and complement each other. Here the effect of the different intermediaries is multiplied, as for example seen in construction. The sector-based BFAs have an important role in terms of coordinating these integrated efforts and ensuring that the intermediaries perceive the issues and potential solutions in the same way.

▪ Information

OSH information and campaigns for MSEs basically needs to be simple and adjusted to the recipient in the industry. Especially the starting points — OSH information sheets and manuals and the written risk assessment — need to be simple, if the MSEs are to use them. Often the MSEs complain that information material is too complex, but once it is explained to them how it works they find out that it is quite simple. However, often they simply do not take the time to find out how it works. The communication with the MSEs must be clear and simple. In the construction workshop, cartoons and other very simple instruction sheets were highlighted as an efficient tool for information on risks, especially since not all craft workers are strong readers, so some of them prefer direct contact or easily accessible and simple instructions. If the information is written, then it is important that it is kept rather short. Also in construction, almost all construction workers will carry a smart phone, so that fact was exploited to show simple solutions on the internet on social media.

▪ Incentives

The initiatives the intermediaries promote among MSEs need to be clear and understandable and the potential gains should be made clear from the outset. If there are, for example, potential productivity gains, this should also be spelt out. It is important that the MSEs can see what they are gaining; otherwise it can be hard to get them to prioritise participating in the initiatives, given their strong focus on the core business tasks. Some of the most successful initiatives in Denmark (such as the prevention packages) have included funding for reimbursement of the MSEs for, for example, time lost, which obviously made it very attractive for the MSEs, but also difficult to finance for large groups of companies. Some highly positive experiences with the prevention package was reported from the auto repair shops, which had worked as a door opener to introduce OSH discussions into the small auto repair shops. Since the prevention packages came without help from consultants at the actual worksites, the industry association stepped in as an intermediary organisation, helped its members implement the packages and also drew their attention to the existence of the packages in the first place. This gave a win-win

situation whereby the companies would get more assistance in implementing the prevention packages and the industry association could add another (free for both partners) service to its membership benefits.

7 Conclusion

The dialogue workshops and the follow-up and additional interviews conducted have provided a number of relevant and interesting insights into the work environment and the organisation of OSH measures in MSEs and, in particular, how various intermediaries affect these. The data generally confirmed the findings from the previous phase of the project (EU-OSHA 2018a; EU-OSHA 2018b) that owner-managers and staff in MSEs are interested in having a good work environment, but in general lack the managerial tools and economic resources for dealing with OSH. The MSEs do not prioritise OSH matters, since they mainly focus on the core business tasks. This also makes it hard for intermediaries to address OSH in MSEs, since establishing contact and building a long-term relation with the MSEs can be challenging and expensive. The participants in the dialogue workshops agreed in general on these main barriers: lack of resources and focusing on the core task. Therefore, initiatives, programmes, tools and so on aimed at OSH in MSEs should be adapted to the particular needs of the MSEs and adapted to the specific sector, subsector or even company.

Because of the limited attention OSH is given in many MSEs, working with improving OSH through intermediaries can be an effective way to reach many MSEs. If the effort is coordinated among the intermediaries, the reach and scope of the intermediaries can be improved, as experience from the Danish construction industry shows. In this research project, we have emphasised four groups of intermediaries that may all have an important impact in terms of improving OSH: these included employers' associations, unions, OSH regulators (in the Danish context, OSH inspectors from the WEA) and OSH advisors; furthermore, the suppliers also had a more important role than expected. These intermediaries have different starting points and levels of access to MSEs, so they also have various experiences as well as inputs for working with OSH in MSEs. But OSH regulation and inspections do provide a minimum of attention and compliance, which also provides many of other intermediaries with a benchmark and a platform to act upon, in particular the OSH advisors and employers' associations.

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Appendix

List of organisations participating in workshops, focus groups and interviews

Dialogue workshop, construction (13 October 2016)

Dansk Byggeri (Danish Construction Association)

Danske Malermestre (painters' employers' association)

Tekniq (plumbers' employers' association)

Glarmesterlauget (glaziers' employers' association)

Dansk Byggeri (Danish Construction Association)

3F Byggegruppen (United Federation of Danish Workers, construction section)

3F København (United Federation of Danish Workers, construction section, local section Copenhagen)

Malernes Fagforening (painters' union)

Blik & Rør (plumbers' union)

Hultafors (supplier company, construction)

BFA-BA (sector OSH council, construction)

Alectia (OSH advisor)

COWI A/S (OSH advisor)

Festool (supplier company, construction)

Arbejds miljøcenteret (OSH advisor)

BAMBUS (OSH advisory service, construction)

Arbejdstilsynet (Working Environment Authority)

Dialogue workshop, manufacturing (1 November 2016)

Arbejds miljøafdelingen (Confederation of Danish Industries)

DI (Confederation of Danish Industries)

Bryggeriforeningen (The Brewery Association)

HK (union for clerical workers)

3F Industrigruppen (United Federation of Danish Workers, manufacturing section)

Alectia (OSH advisor)

Avidenz (OSH advisor)

Arbejds miljørådgivere (OSH advisor)

TeamArbejdsliv (OSH advisor)

Arbejdstilsynet (Working Environment Authority)

Dialogue workshop, private service (16 October 2016)

Horesta (employers' association)

DI (Confederation of Danish Industries)

Dansk Erhverv (Confederation of Danish Enterprise)

Tidligere 3F (United Federation of Danish Workers)

Arbejdsmiljøpolitisk konsulent 3F (United Federation of Danish Workers)

Alectia (OSH advisor)

Arbejdsmiljørådgiverne (OSH advisor)

Kristina Nedergaard, AT (Working Environment Authority)

Additional interviews

Dansk Metal København (metal workers' union)

Danmarks organisation for selvstændige frisører og kosmetikere, arbejdsgi-verforening (employers' association, hairdressers)

Fødevarestyrelsen (Danish Veterinary and Food Administration)

Dansk Bilbrancheråd (Danish Car Repair Association)

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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