

Qualitative post-test evaluation of ESENER: Establishment interviews- ITALY

European Risk Observatory

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Introduction

This report presents the findings for each establishment visited in Italy as part of the qualitative post-test of the European Survey of Enterprises on New and Emerging Risks (ESENER). Fifteen establishments were visited in total. Each establishment overview details any technical issues that emerged concerning the tested questions and a summary of findings. Data from interviews with both the management representative and, where available, the employee representative are included within each establishment overview.

1 Establishment Overview ID 11409

1.1 Establishment background

The company is a medium-sized organisation in the producing mechanical sector with 160 employees (approximately 100 metal workers, 60 mechanical engineers or technicians and two administrators). Employees have regular permanent contracts, except for 25 workers who are agency workers. There are three lines of business. The main activity relates to the production of machines for brick packaging, the second line of business is the production of parts for helicopters and the third area is the production of machines to cut and produce pieces of electric cable. The company operates on two sites but all producing activities are carried out at the main site, the headquarters. The second site is a small site where they carry out research on new machines (approximately five workers work at this site).

1.2 Respondent profiles

The management representative is the operational safety manager and has worked for the company since 2000. She is responsible for the whole implementation and monitoring of health and safety (H&S) procedures and quality control. She is also in charge of all training for employees in H&S, management of the H&S system and monitoring of accidents or near misses. Her background is in mechanical engineering and she has held responsibility for H&S in all her roles. She has done all training required by the D.Lgs81/2008 for a health and safety manager with a degree level of education (Modules A, B and C). Every year she receives additional training to keep up with legislation and health and safety procedures.

The employee representative is an RLS (*Rappresentante dei lavoratori per la sicurezza*, Workers' representative on health and safety)) He has worked at the company since 1994 as a metal worker and has held the role of RLS since 1996. Since then none of his colleagues have wanted to take over his role. When he started as RLS he was passionate and interested in the topic but now he wants someone else to take up the role.

'You need a change, I've been here for so long that I don't think I have a critical attitude anymore as much as I used to, you need fresh eyes. I'm aware that sometimes I miss things I don't see the problems as a fresh mind would do. I'm desperate to find someone to take over this role, but they are afraid of responsibilities. I'm trying to convince a young colleague now, let's see.'

RLS

He has done all the training required by law and every year attends the compulsory training courses for those holding the RLS post. However, he is very critical about this training which he thought was of low quality and old fashioned in its content and format.

'These courses are not interactive, always the same stuff, year after year. The teacher just puts on some slides and we watch them. I can watch them at home. I can check on the internet what the legislation says. These are just tick box exercises required by our bureaucratic system. I would like something more interactive with concrete examples. The best thing about these courses is that you can talk and confront your experience with representatives from other companies.'

RLS

1.3 Organisation of health and safety

The operational safety manager reports directly to the owners of the company, although she is not part of the prevention and protection service (SPP: *Servizio di Prevenzione e Protezione*). This means that she is not legally responsible for health and safety in the company. Instead the company uses an external consultant as its RSPP (Responsible for the Services of Prevention and Protection, *Responsabile del Servizio di Prevenzione e Protezione*), which is the person responsible of the prevention and protection service as required by D.Lgs81/2008.

The safety manager, together with the RSPP, is responsible for ensuring the company is compliant with health and safety legislation and overseeing the safety management system. However, the risk assessments are certified by the external RSPP. The safety manager reports annually on health and safety performance during the annual meeting of the SPP (*Servizio di Prevenzione e Protezione*). The safety manager has a high degree of freedom in planning any type of training related to H&S.

The company has a well-developed H&S system. It takes a business approach to H&S in the sense that it considers accidents and sickness absence as a loss for the company. The company is certified ISO 14001 and OHSAS 18002 and holds other environment certificates required by its clients. Due to the hazards inherent in the work, the business is considered a high risk sector.

1.4 Health and safety performance

According to the proforma, there were 11 accidents in the last year, and 99 working days lost due to work-related accidents (for employees). Four per cent of overall working time was lost due to work-related accidents and ill health.

During the interview the safety manager and the RLS said there had been an improvement in health and safety performance during the last few years.

There are four people involved in health and safety, one manager and three other employees. Table 2 (average number of hours per month) was completed for three members of staff only and the total number of hours was 110 (80 hours for staff member 1, 20 hours for staff member two and ten hours for staff member 3. (This table does not appear to have been well understood.)

The costs of purchasing health and safety services between January 2011 and December 2011 were as follows: occupational health doctor (€8,000), external consultancy services (€5,500), training (€10,000), personal protective equipment (€6,500), training/educational material (€3,000).

1.5 Main technical issues

(issues with interpretation of questions, concepts and words; sensitivity of questions; problems in recall or reaching a judgment in answering)

M159/ER214: Overall, how would you rate the degree of involvement of the line managers and supervisors in the management of health and safety? Is it very high, quite high, quite low or very low?

In this question 'line managers and supervisors' has been translated as '*direzione e dirigenti*' which refers to staff higher up in organisational hierarchy. In this establishment, because of the simple structure of the business the RLS identified the 'direzione' as the owners and 'dirigenti' as the safety manager. The safety manager identified the 'direzione' as the owners and 'dirigenti' as other managers (eg HR manager).

ER209: Do you have a say in the decisions on when and where these risk assessments or workplace checks are carried out? and ER211: And are you as health and safety representatives usually involved in the choice of follow-up actions?

The RLS thought these two questions were very similar and gave the same answer.

'By proper consideration I mean that there is the right balance. But then it is complicated to say what is important for one person or the other. I'm not sure about what this means, for me it is a balanced situation.'

RLS

The interviewee asked for the question to be repeated because by the end of it he had forgotten the options.

MM162: Are these risk assessments or workplace checks mostly conducted by your own staff or are they normally contracted to external service providers?

The question threw up two sets of issues, one concerning the wording of the question and the other concerning the response options provided. The wording 'mostly conducted' and 'normally contracted' in the question led the manager to ask what 'mostly' and 'normally' mean whilst it was felt that the four response options (conducted by own staff, contracted to external providers, both about equally, and no answer), did not fully represent what happens in practise. In this establishment some checks are conducted by internal staff and others by external providers (depending on the level of expertise needed and the reasons for carrying out the checks). The manager would have preferred this to have been a multiple response question.

MM163: On which occasions are these risk assessments or workplace checks carried out?

In this question there are a number of possible issues related to the meaning of risk assessment and the occasions or reasons for carrying out workplace checks. In Italy there is a compulsory risk assessment and all companies have to keep the risk assessment document, called DVR (*Documento di Valutazione dei Rischi*). By law the risk assessment should be carried out every four years or every time there is a significant change in the work process. But, this is often a tick box exercise and companies with good H&S systems in place perform workplace checks, or have in place H&S procedures, that go beyond the risk assessment. This is the case of this company. The safety manager explained how the company re-assesses different parts of the risk assessment document every time there is a significant change in products, work processes, new machines etc. However, there are routine procedures that go beyond the legislative requirements and informal workplace checks are carried out much more frequently, often without reasons or following a request from employees.

On the basis of this it may be better for the survey to have two sets of questions, one asking about formal risk assessments and another asking about more informal workplace checks.

MM164: Which of the following areas are routinely considered in these (workplace) checks?

The manager said no to item 3 (irregular or long working hours) when really this should have been not applicable because there are no irregular or long hours in the company. Whilst supervisor/employee relationships are not formally part of the risk assessment the manager did not believe employees would have any problems discussing issues with supervisors. The meaning of 'the way work is organised' did not appear to be well understood. The manager said that this was not included in

risk assessments because employees' tasks are interchangeable but later said something that suggested this could prompt a risk assessment:

'Every time that there is a new event, a new machine or someone changes tasks for the first time, we carry out the risk assessment for that particular event.'

Safety Manager

MM166: And which of the following actions have been taken as a follow-up to these (workplace) checks?

Whilst the manager said yes to a number of the options, she explained that some of these changes did not occur following a risk assessment but were prompted by other events such as the suggestion of employees. The provision of training (item 4) did not necessarily follow checks as this is planned and routinely provided according to employees' needs and legislative requirements. Although in MM164 the safety manager said they do not check the way work is organised, in MM166 she said that changes to the way work is organised was an action that has been taken following a risk assessment.

MM200/ER250: For each of the following issues, please tell me whether it is of major concern, some concern or no concern at all in your establishment?

In answering whether or not a risk was of concern, the safety manager and RLS considered the presence of risk, the potential severity of the risk and, in particular, the extent to which it could be managed.

MM171: In your establishment, how important are the following reasons for addressing health and safety? For each one, tell me whether it is a major reason, a minor reason, or no reason at all?

In Italian this question can be confusing because of inconsistency between the wording of the question and the options given. The Italian question is: 'Per ognuno dei seguenti aspetti mi dica se e' un motivo prioritario, secondario o se non lo e' affatto'. The question uses the word 'prioritario' while the options given in the following items are 'Importante, Secondario, No, N/A'. This meant that it was difficult to respond to the question; the safety manager pointed out that some items are a priority and others are important but not a priority.

MM172: In your establishment, what are the main difficulties in dealing with health and safety? Please tell me for each of the following whether it is a major difficulty, a minor difficulty, or not a difficulty at all?

The following items: 02) A lack of awareness, 03) A lack of expertise; 04) A lack of technical support or guidance; were all considered a minor difficulty by the safety manager. She interpreted these items as referring to her own awareness, expertise or support rather than the organisation as a whole. The meaning of

'sensitivity of the issue' (item 6) was not clear to the manager. Item 5 concerning organisational culture doesn't allow for the fact that there may be external workers in the organisation. The safety manager believed there was a big difference between the culture of in-house employees (not a difficulty) and external workers in the organisation (a major difficulty).

ER102: Is there a permanent committee or working group consisting of members of the management and representatives of the employees dealing with safety and health in this establishment?

The RLS initially said that there was no permanent committee or working group. However, later he mentioned that there are groups made up of managers and technicians which focus on different areas of health and safety. When asked why he found it difficult to understand the question the RLS replied that it is too broad. He was put off by the use of the word 'permanent'.

'What do you mean for permanent committee? No, we don't have this, but there are people that are trained in health and safety procedures.'

RLS

ER205: Are employees in this establishment regularly informed about safety and health in the workplace?

The RLS answered yes and went on to discuss the training received. He thought the wording 'informed' made this question a bit vague.

'Regularly informed, it could be anything, even the signs that we have around the site. I could say immediately yes, but then what does regularly means? I would take the word 'regularly' off the question and specified what informed is for you.'

RLS

ER107 - How often do controversies related to safety and health arise between the management and the employee representatives? Is this often, sometimes, or practically never the case?

The RLS believed that 'controversies' was a strong word not applicable to his company and the cooperative relationship he had with the safety manager.

'No, we don't have controversies. This is a strong word. For me 'controversies' is when there is a tension, a problem where there is no way to find a solution or a common ground. We don't have these situations.'

RLS

ER215_05: Please tell me whether you agree (1), neither agree nor disagree (2), or disagree (3) with the following statement: ‘Our management gives proper consideration to occupational safety and health issues raised by employee or their representatives’

The RLS pointed out that the phrase ‘proper consideration’ is vague and open to interpretation.

MM402: How would you rate the level of absenteeism in your establishment compared with other establishments in the sector? Is it very high, quite high, about average, quite low or very low?

The safety manager regarded their level of absenteeism as about average, although she pointed out the lack of comparable data on which to base her response.

‘I think it may be about average, but it is difficult to answer to this question because we don’t have data to compare and then we don’t know if the absence is related to illnesses or other reasons. There is no data available for absence due to accidents or injuries in our sector, so I don’t know how to compare. I can only check my data over the years and see that we are improving.’

Safety Manager

The safety manager thought that the meaning of absenteeism should be better explained.

‘For absenteeism do you mean absenteeism for illnesses or for other reasons? The way I measure absenteeism includes all type of illnesses plus maternity leave’

Safety Manager

New question: Compared to other organisations of your size and sector in Italy, how well would you say you perform in terms of health and safety outcomes such as the number of accidents and injuries at work, and the level of sickness absence?’

The safety manager pointed out that this question would need a ‘Don’t know’ option as ‘No answer’ is different from ‘Don’t know’.

New question: Compared to other organisations of your size and sector in the UK, how well would you say you perform in terms of business outcomes such as profit, turnover or other relevant measures of performance?’

The safety manager pointed out that this question would need a ‘Don’t know’ option as ‘No answer’ is different from ‘Don’t know’.

1.6 Summary of respondents' answers

1.6.1 Approach to management of health and safety

MM155/ER200: Is there a documented policy, established management system or action plan on health and safety in your establishment?'

Both the safety manager and employee representative referred to the health and safety policies related to the certification system ISO and OHSAS and environmental policies. The policies set out responsibilities for health and safety and safety behaviour rules for all employees.

The company has had an internal H&S written policy and procedures since 2008. The policy is checked and reviewed every year during the annual meeting with managers and directors of the prevention and protection service. The policy covers all areas of H&S for both sites of the company.

The safety manager also highlighted the existence of an occupational health and safety development plan which sets out objectives and activities for the year, and which is reviewed during the annual meeting of the prevention and protection service where managers decide strategy and changes for the following year.

Additionally managers and employees meet up to discuss problems or what need to be changed. Employees are actively encouraged to talk about possible issues with their line managers and report any problems they see in the workplace.

'Here everything is written down, we also have certifications for health and safety and environment. Apart from the official documents, the [safety] manager writes everything down, although many issues are resolved informally, we just talk about what needs to be done and we do it, but then she puts everything on record. We are all involved in the process as all employees have the duty to inform immediately either myself or the [safety] manager if they see something that is not right.'

RLS

The RLS told of a collaborative approach and informal relations between the safety manager and all employees at the site, and he emphasized that since the safety manager started her post the health and safety system had improved remarkably.

MM156/ER202: In practice, how much of an impact does this policy, management system or action plan have on health and safety in your establishment? Does it have a large impact, some impact, or practically no impact?

Both the safety manager and the RLS thought that there had been some impact since the implementation of the policy. The RLS didn't say large impact because that would mean that '*everything is perfect*', although he did strongly believe that the H&S policies and procedures were well implemented and told of constant

attempts to improve awareness levels and the organisational culture concerning health and safety.

They both believed that the term 'impact' relates to concrete and measurable changes in the workplace as well as improved safety behaviour amongst employees.

MM159/ER 214: Overall, how would you rate the degree of involvement of the line managers and supervisors in the management of health and safety? Is it very high, quite high, quite low or very low?

Both the safety manager and the RLS rated, without hesitation, the degree of involvement as 'very high'. The company has a simple structure as there are two directors (also the owners), the safety manager, the HR manager, account manager and supervisors. Supervisors are involved in H&S in the sense that all employees are strongly encouraged to discuss any possible issues with supervisors, the safety manager or the directors. Other managers (account and HR managers) are also actively involved in planning and implementing H&S procedures, mainly during the annual meeting of the protection and prevention service.

The owners both have technical backgrounds (in mechanical engineering) and participate in meetings with employees and line managers. The work environment is very informal and the two owners are very much involved in all activities of the company including health and safety.

The RLS discussed the high engagement of the owners and their apparent interest in health and safety and employees' issues. In terms of the safety manager, he discussed her practical accomplishments and processes that she had implemented in addition to her engagement with employees and him.

'I say high because I'm sure that they [the owners] have their business priorities, in terms of revenue, profits etc... but they found the right balance between their priorities and looking after employees' safety. That's why I think there is a high involvement of the owners and the managers. The system has improved massively over the years, mostly since this health and safety manager started... There is definitely great attention to all these from the owners.'

RLS

'I talk to him [the owner] directly without any problem, he is a very open minded person, informal, we cannot say that he doesn't care. There is a really open approach.'

RLS

ER215_05: Please tell me whether you agree (1), neither agree nor disagree (2), or disagree (3) with the following statement: ‘Our management gives proper consideration to occupational safety and health issues raised by employees or their representatives’

The RLS agreed with the statement. The informal relations between employees and managers mean that employees can discuss issues directly with the safety manager and the owners.

‘I would say, as far as I’m aware I agree, but obviously I don’t know everything. It may be that some issues have been discussed directly with the managers in these cases I cannot say.’

RLS

(See section on issues)

1.6.2 Risk Assessment

MM161/ER207: Are workplaces in the establishment regularly checked for safety and health as part of a risk assessment or similar measures?

Both the RLS and safety manager answered found this question straightforward and answered ‘yes’. They were able to provide examples of these without hesitation. Apart from the risk assessment carried out for legislative purposes, the company has strict internal procedures in place so every two months internal checks are carried out and all departments are checked at least once per year. These checks are done by internal technicians (usually engineers) trained in H&S and are documented.

According to the safety manager the term ‘regularly’ means something that is planned and repeated over time, more than once per year. Similarly for the RLS, ‘regularly’ is something that is done systematically. However, the RLS thought it was important to get the right balance between frequency of checks and dealing with real issues in the workplace.

‘You need a systematic system, but it doesn’t need to be an obsession otherwise it is devalued by employees. For example if as an RLS I send letters for everything people wouldn’t take me seriously. Let’s say it is done in the right measure with the right balance.’

RLS

MM162: Are these risk assessments or workplace checks mostly conducted by your own staff or are they normally contracted to external service providers?

Checks are conducted both by external providers and internal staff. The statutory risk assessment and checks required by external certifiers are carried out by external providers, while the informal checks carried out every month according to internal policies are conducted by internal technicians/engineers.

MM163: On which occasions are these risk assessments or workplace checks carried out?

01) Following a change in the staffing, layout or organisation of work; 02) At the request of employees eg in case of complaints; 03) At regular intervals, without any specific cause

01) They re-assess different parts of the risk assessment document every time there is a significant change in products, work processes, new machines etc...

02) Employees are encouraged and strongly advised to talk to their managers or whoever is in charge if they see something wrong. The manager said that they had never had complaints as such, but had been made aware of possible issues. Employees request would lead to workplace checks but not necessarily to a risk assessment.

03) By law the risk assessment should be conducted every four years and every time it is required by a change, they conduct this statutory risk assessment and monthly checks according to internal procedures.

MM164: Which of the following areas are routinely considered in these checks?

01) Equipment and working environment; 02) The way work is organised; 03) Irregular or long working hours; 04) Supervisor-employee relationships

The manager responded yes to 01) and no to 02), 03) and 04).

MM166: And which of the following actions have been taken as a follow-up to these checks? 01) Changes to equipment or working environment; 02) Changes to the way work is organised; 03) Changes to working time arrangements; 04) Provision of training

The company had taken actions that concerned changes to equipment, the way work is organised and the provision of training. No actions were taken in relation to working time arrangements; working time is set in the organisation and there is no room for change (except for metal workers who are allowed to start earlier in the summer due to high temperatures).

ER209: Do you have a say in the decisions on when and where these risk assessments or workplace checks are carried out?

The RLS said the safety manager included him in all decisions regarding H&S although he is not formally and physically involved in the legislative risk assessment process.

ER210: If the risk assessment or workplace check identifies a need for action: Is the necessary follow-up action taken?

Yes.

ER211: And are you as health and safety representatives usually involved in the choice of follow-up actions?

Yes, as for ER209 the RLS said he was informally involved in all H&S decisions.

1.6.3 Levels of concern with occupational safety and health risks

MM200/ER250: For each of the following issues, please tell me whether it is of major concern, some concern, or no concern at all in your establishment? 01) Dangerous substances (eg dusts, chemical, biological); 02) Accidents; 03) Noise and vibration; 04) Musculoskeletal disorders; 05) Work-related stress; 06) Violence or threat of violence; 07) Bullying or harassment

Dangerous substances were considered a major concern by both the safety manager and the RLS due to the type of work done by the company (there is always a high level of awareness and concern on how to control these hazards).

Accidents were classified as a major concern by the safety manager in the sense that they try to follow strict rules and constantly monitor the level of near misses. However, she thought it could also be labelled as 'some concern' as the level of accidents or near misses in the company had dropped to almost none in the last 10 years. The RLS classified the accidents as some concern, because, although they did not have any, it was an area he thought needed to be constantly monitored.

Noise and vibration were considered of some concern by both the safety manager and the RLS. The type of work they carry out doesn't involve high levels of noise and vibration and all machines and working processes have been checked in this regard. There is an insulated room to carry out works that may have high level of noises.

MSDs were acknowledged as a major concern by the safety manager because it is difficult to control these risks due to lack of knowledge of safe positions for all types of work. The work stations and equipment of all administrative workers (PC, chairs etc) are bought and checked according to legislative requirements. However, metal workers' environments are not checked in the same way because there is an assumption that MSD risks have been designed out of these machines and they do not have information on how to check their positions. The RLS said there was only some concern about MSDs, as safety procedures had improved remarkably in the last few years.

Neither the safety manager nor the RLS were concerned about work-related stress, violence, bullying etc. The manager stated that the risk of these was nil as the workplace is friendly and open.

What did you understand by the phrase ‘concern in your establishment’?

‘Concern for me means that there is a specific problem and I need to dedicate time and resources to solve the problem.’

1.6.4 Drivers of and barriers to management of health and safety

MM171: In your establishment, how important are the following reasons for addressing health and safety? For each one, please tell me whether it is a major reason, a minor reason, or no reason at all. 01) Fulfilment of legal obligation; 02) Requests from employees or their representatives; 03) Staff retention and absence management; 04) Economic or performance-related reasons; 05) Requirements from clients or concern about the organisation’s reputation; 06) Pressure from the labour inspector

The safety manager felt that 01) fulfilment of legal obligation, 02) requests from employees or their representatives, 04) economic or performance-related reasons, and 06) pressure from the labour inspector were major reasons for addressing health and safety, whilst the other two issues were minor reasons. The extent to which it was a major or minor concern related to how severe the consequences would be if the company paid no attention to these issues.

‘Major reasons [are a priority] in terms of what could happen if we don’t take measures. For example if there is a legal obligation the consequences of not doing it could be catastrophic for us or if an employee highlights a problem is important to look into it, and in these years I’ve learned that employees’ observations are a great help to constantly improving our H&S system. The client instead is not a priority in the sense that, yes they look at it, but there are also other aspects that they are interested in.’

Safety Manager

MM172: In your establishment, what are the main difficulties in dealing with health and safety? Please tell me for each of the following whether it is a major difficulty, a minor difficulty, or not a difficulty at all.

01) A lack of resources such as time, staff or money; 02) A lack of awareness; 03) A lack of expertise; 04) A lack of technical support or guidance; 05) The culture within the establishment; 06) The sensitivity of the issue

01) The lack of resources was felt to be a minor difficulty - despite the economic crises the budget on H&S wasn’t cut.

‘Is a minor in the sense that money is important and is never enough but we try always to do what we can. Now with the economic crises is more difficult but health and safety is still a priority’

Safety Manager

02) A lack of awareness, 03) a lack of expertise and 04) a lack of technical support or guidance were all considered a minor difficulty. All these items were seen as referring to her own ability to provide support to the establishment.

'If I realise that I don't know something or I need training I ask for external help or funds to do the training that we need'

Safety Manager

05) The safety managers felt that the culture amongst the company's own employees was not a problem at all, but was concerned about the culture of visiting contractors.

'The employees are now all aware and trained to consider health and safety a priority. The problem is when we have new employees or external workers, in that cases we have to work on it because often they don't take it as seriously as they should. In general in Italy we don't have a culture of health and safety for example schools don't even consider this area or subject'

Safety Manager

06) The sensitivity of the issue was a minor problem for her, although she didn't understand what this meant.

1.6.5 Worker participation and involvement

ER102: Is there a permanent committee or working group consisting of members of the management and representatives of the employees dealing with safety and health in this establishment?

In the company there are groups made up of managers and technicians which look at the different areas of health and safety.

ER205: Are employees in this establishment regularly informed about safety and health in the workplace?

Yes the RLS said that employees are informed.

ER107: How often do controversies related to safety and health arise between the management and the employee representatives? Is this often, sometimes, or practically never the case?

The RLS answered practically never.

ER150: Do you as the employee representative for safety and health usually get sufficient time off from normal duties to perform these tasks adequately?

The RLS found this question straight forward and told how he is given 40 hours per year for his health and safety tasks. He believed this was sufficient as generally the standards of health and safety in the establishment are high.

'Yes, in my case yes. I don't need more time now that the system in place is good; I have enough time to do all my checks.'

RLS

What does the term 'adequately' mean to you?

'That I do my job accurately without missing out issues or things in general. That I have access to data, documents and I can do my checks around the site without problems.'

RLS

ER154: Does the management provide you with the necessary information for carrying out your health and safety tasks properly?

Yes. The safety manager provides the RLS with all documents related to health and safety and the written risk assessments. Most important to the RLS was that he and the safety manager had a good and cooperative relationship.

ER155: Do you usually receive information on time and without having to ask for it?

The RLS found this question straight forward and answered yes.

ER159: On which of the following issues have you or your health and safety representative colleagues received training?

01) Fire safety; 02) Prevention of accidents; 03) Chemical, biological, radiation or dust hazards; 04) Ergonomics; 05) Violence, bullying or harassment; 06) Work-related stress; 07) Discrimination (for example due to age, gender, race or disability)

The RLS found this question straight forward and said that he had received training in all areas.

ER160: Is this training sufficient or would more training in any of these fields be desirable?

There were no problems with this question. The training was considered insufficient because of the quality of teaching and the fact that the course material had been presented in an old-fashion way.

'I would say that I don't need more training but different training, not a tick box exercise. They need to give more space to the creativity of teachers. But, maybe this is a topic that it is difficult to make interesting, I don't know. I only know that I have enough of the same stuff year after year.'

RLS

1.6.6 OSH and organisational performance

MM402: How would you rate the level of absenteeism in your establishment compared with other establishments in the sector? Is it very high, quite high, about average, quite low or very low?

The safety manager regarded the level of absenteeism as about average, although she pointed to a lack of comparable data and was unsure what was covered by the term.

New question: Compared to other organisations of your size and sector in Italy, how well would you say you perform in terms of health and safety outcomes such as the number of accidents and injuries at work, and the level of sickness absence?'

The safety manager said she didn't know because of a lack of comparable data.

'I don't know in this case, as I said I've never found data to compare our performance. I can only check against our historical data, I can set an objective of zero accidents and injuries, that is unrealistic anyway, and then see how I'm doing over the years'

Safety Manager

MM403: How would you rate the current economic situation of this establishment? Is it very good, quite good, neither good nor bad, quite bad or very bad?

The safety manager said the situation was quite good in general.

New question: Compared to other organisations of your size and sector in Italy, how well would you say you perform in terms of business outcomes such as profit, turnover or other relevant measures of performance?

The safety manager answered 'don't know' because of lack of comparable data for other businesses in the same sector.

2 Establishment Overview ID 22009

2.1 Establishment background

The company is a small organisation with 14 employees. The employees all have permanent contracts, plus there are three external workers with a 'collaboration contract' (*contratto di collaborazione*) for maintenance activities and being a porter. The company operates in the private producing sector; they produce decaffeinated raw coffee and natural caffeine. Clients are mainly Italians; the company either receives the raw coffee from clients to decaffeinate or buys raw coffee and sells it decaffeinated. The company operates in the north east of Italy from one site, although they have an external lab where they perform analysis for the company and external organisations.

2.2 Respondent profiles

The management representative is the safety manager and quality controller in the company. He is also the RSPP (*Responsible for the Prevention and Protection Service*) (*Responsabile del Servizio di Prevenzione e Protezione*). The safety manager has worked for the company since 1998. At the beginning he was employed to take the company to ISO 9000 certification and then was taken on permanent and given responsibility for quality control and health and safety. He has a degree in chemical engineering. His responsibilities include the implementation and monitoring of health and safety and environmental procedures, managing productions and maintenance, maintaining ISO 14000 certification, and managing the acquisition of all new machines and technical equipment. As RSPP he has completed all the statutory training courses plus all the courses and training required by the legislation.

The employee representative has worked for the company since 1995 and was elected RLS (*Rappresentante dei Lavoratori per la Sicurezza*, Workers' representative on health and safety) in 2011. He started as an external consultant and in 2000 was taken on as permanent. He is an electrician and carries out maintenance activities in the establishment.

2.3 Organisation of health and safety

Because of the small size of the company, the safety manager is in charge of all areas of business including health and safety, quality control and environment. As RSPP, he has legal responsibilities and duties for health and safety and has full authority to make financial, technical and operational decisions concerning health and safety.

The company is certified ISO 14000 and 9000. The company's internal health and safety procedures are set within OHSAS 18001 parameters although the company does not hold this certification.

Every year they do an annual meeting with all employees on health and safety risks during which they discuss the results of risk assessment.

'Once the risk assessment is done I do sessions with the employees in groups to explain them what has been done and the procedures that they need to follow'

Safety Manager

2.4 Health and safety performance

According to the proforma there is one manager in charge of health and safety and 9 employees with health and safety responsibilities, these include the RLS and employees with responsibilities in case of emergency and evacuation.

The manager spends around 20 hours per months dealing with health and safety issues.

In the year January 2011 to December 2011, the company spent €500 on an occupational health doctor, €1,000 on health and safety external consultants, €1,000 on training, €2,500 on maintenance of an air conditioning system and €1,800 on a boardwalk to access the external tank.

The number of working days lost due to work-related accidents and ill-health and the number of accidents was zero for all employees.

2.5 Main technical issues

(issues with interpretation of questions, concepts and words; sensitivity of questions; problems in recall or reaching a judgment in answering)

The interview with the RLS was difficult. He was of Serbian nationality, and although he had been in Italy for many years his language skills were poor; he often didn't understand the questions or the probs. There also seemed to be a strong social desirability bias in his answers as he seemed keen to give a good impression.

ER200: Is there a documented policy, established management system or action plan on health and safety in your establishment?’

The RLS asked for the question to be repeated and for explanation. Although he answered yes he probably didn't understand the question.

ER202: In practice, how much of an impact does this policy, management system or action plan have on health and safety in your establishment? Does it have a large impact, some impact, or practically no impact?

The RLS didn't respond using the options provided. Instead he provided a quick answer which was not clearly related:

'This company does everything that they can to have a secure working environment. Very well, the guy that works on health and safety is really good.'

RLS

He considered the language used in the question too technical, given that he was not a native Italian speaker.

ER210: If the risk assessment or workplace check identifies a need for action: Is the necessary follow-up action taken?

Again the wording of the question was considered difficult for a non-native speaker.

MM200/ER250: For each of the following issues, please tell me whether it is of major concern, some concern, or no concern at all in your establishment? 01) Dangerous substances (eg dusts, chemical, biological); 02) Accidents; 03) Noise and vibration; 04) Musculoskeletal disorders; 05) Work-related stress; 06) Violence or threat of violence; 07) Bullying or harassment

The wording of the question was considered difficult for a non-native speaker. The RLS said he did not understand the exact meaning of the question and he did not provide answers according to the response options provided, but on the lines of whether he thought a risk was present. Additionally, he did not know the meaning of 'musculoskeletal disorders'.

'I don't know how to define concern. ... Accidents no, we have only minor accidents ... there is noise but is under control... I don't see any stress.'

RLS

MM171: In your establishment, how important are the following reasons for addressing health and safety? For each one, please tell me whether it is a major reason, a minor reason, or no reason at all. 01) Fulfilment of legal obligation; 02) Requests from employees or their representatives; 03) Staff retention and absence management; 04) Economic or performance-related reasons; 05) Requirements from clients or concern about the organisation's reputation; 06) Pressure from the labour inspector

In the Italian translation there are inconsistencies with the way the question is worded and the response options, so the safety manager felt the need to specify his answers were about 'priority' rather than 'importance'. He used the response option '*prioritario*' to refer to situations where he would take actions immediately without delays and '*secondario*' for issues that were much lower on the list of priorities.

'Prioritario means that you do it immediately, secondario that you can wait or even not take that specific reason into account.'

Safety Manager

Staff retention and absence management (item 3) were perceived as two completely different problems. The company has a very low turnover, so this is not a problem, whilst absenteeism needs to be managed very carefully. The safety manager was confused about item 4, whether it concerns the beneficial effects of good health and safety practise on company performance or the economic constraints they face in relation to health and safety. He also thought it could be asking whether the company measures its performance against safety behaviour.

MM172: In your establishment, what are the main difficulties in dealing with health and safety? Please tell me for each of the following whether it is a major difficulty, a minor difficulty, or not a difficulty at all. 01) A lack of resources such as time, staff or money; 02) A lack of awareness; 03) A lack of expertise; 04) A lack of technical support or guidance; 05) The culture within the establishment; 06) The sensitivity of the issue

Some of the items were considered to be about the same thing. Items 2 and 5 (awareness and culture) was considered to be the same thing, so the difference needs to be clarified. In addition it should be made clearer who 'lack of awareness' refers to, whether it's about employees, managers, the safety manager or the organisation in general.

Items 3 and 4 were also considered to cover the same thing. Again it needs to be made clearer who these refer to.

ER159: On which of the following issues have you or your health and safety representative colleagues received training? 01) Fire safety; 02) Prevention of accidents; 03) Chemical, biological, radiation or dust hazards; 04) Ergonomics; 05) Violence, bullying or harassment; 06) Work-related stress; 07) Discrimination (for example due to age, gender, race or disability)

The RLS didn't understand the meaning of 'ergonomics' and required some examples in order to understand 'discrimination'.

2.6 Summary of respondents' answers

2.6.1 Approach to management of health and safety

MM155/ER200: Is there a documented policy, established management system or action plan on health and safety in your establishment?'

Both the safety manager and the RLS answered yes. The company carries out the risk assessment as required by legislation, plus there are internal procedures and guidelines based on the OHSAS 18001.

MM156/ER202: In practice, how much of an impact does this policy, management system or action plan have on health and safety in your establishment? Does it have a large impact, some impact, or practically no impact?

The safety manager believed that the policies had a large impact in the organisation. His judgement was based on the fact that health and safety behaviour and attitudes in the company and the implementation of health and safety procedures had improved.

What does the term 'impact' mean to you?

'Impact for me is the effect of the policy on real life. For example the fact that the company has a guidelines and procedures, if they are not applied in practical terms and everyday life they are just wasted paper.'

Safety Manager

MM159/ER 214: Overall, how would you rate the degree of involvement of the line managers and supervisors in the management of health and safety? Is it very high, quite high, quite low or very low?

There were no issues with this question. Both the safety manager and RLS rated the degree of involvement as 'very high'. In this establishment, the safety manager was the only manager so his answer referred to himself and a couple of supervisors. The involvement of the owner was considered 'very low' in the sense

that he didn't get involved in health and safety decisions. The RLSs response also referred to the safety manager and the actions he had taken on health and safety.

'If for 'dirigenti' you mean me, there is a very high degree of involvement, this is my job and I'm responsible for everything. Above me there is the owner, if you mean the owner then this is not really high for the simple reason that once they delegate all responsibilities and know that things are done properly then they don't need to worry anymore.'

Safety Manager

ER215_05: Please tell me whether you agree (1), neither agree nor disagree (2), or disagree (3) with the following statement: 'Our management gives proper consideration to occupational safety and health issues raised by employee or their representatives'

There were no issues with this question and the RLS answered promptly 'agree'.

2.6.2 Risk Assessment

MM161/ER207: Are workplaces in the establishment regularly checked for safety and health as part of a risk assessment or similar measures?'

There were no issues with this question. Yes the work place is regularly checked according to both safety manager and RLS.

'I spent half of my time with the employees, so I know everything that happens every day. Regularly for me is daily attention. Plus I have yearly check from the occupational doctor.'

Safety Manager

'Yes, they do. I think about medical checks, checks that we do in the risk assessment, etc...'

RLS

MM162: Are these risk assessments or workplace checks mostly conducted by your own staff or are they normally contracted to external service providers?'

This question was considered straightforward. The workplace checks and the risk assessment are all conducted by the safety manager. He also performs some of the more technical measurements using his background as a chemical engineer.

MM163: On which occasions are these risk assessments or workplace checks carried out? 01) Following a change in the staffing, layout or organisation of work; 02) At the request of employees eg in case of complaints; 03) At regular intervals, without any specific cause

This question was considered straightforward. Risk assessments are carried out in case of 01) changes in organisation of work and layout but not when there is a change in staffing, in this case they 'keep a close eye' on the employee. Requests of employees lead always to workplace checks but not necessarily to a risk assessment process. The safety manager carries out workplace checks at regular intervals without any specific cause, but not the risk assessment.

MM164: Which of the following areas are routinely considered in these checks?'

01) Equipment and working environment; 02) The way work is organised; 03) Irregular or long working hours; 04) Supervisor-employee relationships

There were no issues with this question. The areas routinely checked and considered in the risk assessment process are 01) equipment and working environment, 02) the way work is organised. As for supervisor-employee relationships, the safety manager specified that this area does not make up part of a formal risk assessment process but he does look carefully into relationships between colleagues in his workplace checks.

They do not check 03) irregular and long working areas because they do not have long working hours.

What do you understand by the term 'the way work is organised'?

'I mean the operational methodologies and procedures that employees have and change very often and the risks associated with the methodologies and changes of processes.'

Safety Manager

MM166: And which of the following actions have been taken as a follow-up to these checks?'

01) Changes to equipment or working environment; 02) Changes to the way work is organised; 03) Changes to working time arrangements; 04) Provision of training

This question was considered straightforward. Actions have been taken in all cases provided for 01) 02) and 04) but not for 03) because they are not checked and there are no long working hours anyway.

ER209: Do you have a say in the decisions on when and where these risk assessments or workplace checks are carried out?

There were no issues with this question and the answer was yes.

ER210: If the risk assessment or workplace check identifies a need for action: Is the necessary follow-up action taken?

The answer to this question was yes.

ER211: And are you as health and safety representatives usually involved in the choice of follow-up actions?'

There were no issues with this question and the answer was yes.

2.6.3 Levels of concern with occupational safety and health risks

MM200/ER250: For each of the following issues, please tell me whether it is of major concern, some concern, or no concern at all in your establishment? 01) Dangerous substances (eg dusts, chemical, biological); 02) Accidents; 03) Noise and vibration; 04) Musculoskeletal disorders; 05) Work-related stress; 06) Violence or threat of violence; 07) Bullying or harassment

The safety manager found this question straightforward, the RLS instead did not provide valid answers according to the response options provided. The safety manager specified that his definition of 'concern' relates to whether they have looked into the problems and taken measures.

'Well it depends what you mean for 'concern'. If you mean that we care about it and take preventive measure, yes.'

Safety Manager

01) Dangerous substances are a major concern because the decaffeinating process requires the use of some chemicals.

02) Accidents are a major concern in the sense that all preventive measures are finalised to reduce and avoid the accidents.

03) Noise and vibration are of some concern, although the issue in this establishment is mainly around noise.

04) Musculoskeletal disorders are of some concern because there is a risk related to movements of goods in the depot, although they have taken measures to avoid manual handling as much as possible.

05) Work-related stress is not a concern. It did not emerge from the risk assessment as a potential risk and the safety manager knows the employees well enough to know whether there is an issue.

06) Violence or threat of violence is of no concern because the company is really small and there is a friendly, informal work environment.

07) Bullying or harassment is of no concern, although the safety manager told of a supervisor who is occasionally verbally abusive and has been disciplined.

2.6.4 Drivers of and barriers to management of health and safety

MM171: In your establishment, how important are the following reasons for addressing health and safety? For each one, please tell me whether it is a major reason, a minor reason, or no reason at all. 01) Fulfilment of legal obligation; 02) Requests from employees or their representatives; 03) Staff retention and absence management; 04) Economic or performance-related reasons; 05) Requirements from clients or concern about the organisation's reputation; 06) Pressure from the labour inspector

According to the safety manager:

01) Fulfilment of legal obligation is a priority.

02) If employees notice an issue or they have problems with something this is considered as an absolute priority as employees are often in the best position to judge whether a situation is risky.

03) Absence management is a priority as they cannot afford to have people off sick, but staff retention is not because they have a very low turnover.

04) Economic or performance-related reasons are a minor priority because performance is not related to health and safety behaviour (it seemed that he was thinking about whether bonuses or performance indicators are linked to safety behaviour).

05) Requirements from clients are a priority as they work for multinational companies and they require high standards of health and safety procedures, quality control and environmental policies.

06) Pressure from the labour inspector was a considered a priority because if there is an inspection and something was wrong than the consequences would be catastrophic for a small company like this.

MM172: 'In your establishment, what are the main difficulties in dealing with health and safety? Please tell me for each of the following whether it is a major difficulty, a minor difficulty, or not a difficulty at all.' 01) A lack of resources such as time, staff or money; 02) A lack of awareness; 03) A lack of expertise; 04) A lack of technical support or guidance; 05) The culture within the establishment; 06) The sensitivity of the issue

01) A lack of resources is not considered a problem at all as health and safety is a priority and the safety manager has no budget constraints from this point of view.

As for staff resources, the safety manager says that it not a problem (although he later added that he works very long hours).

03) 04) a lack of expertise and a lack of technical support are not problems at all. The safety manager has done all the training and courses that he needs and has a strong technical background.

02) 05) A lack of awareness and the culture within the organisation are both minor problems. The majority of employees are well trained and display good safety behaviour but there are attitudinal problems problem with some employees. The safety managers explained that cultural background and age play a fundamental role in terms of positive attitudes towards health and safety.

'Health and safety is one of the areas where the cultural background has the greatest impact. We are a multi-ethnic company with people from different backgrounds. For example we have an employee who, because of his age and very much man-like attitude, refuses to wear the safety equipment, so I need to ask him with a more firm tone. But with different ethnic groups everything is more complicated. The problem is not the language but the culture. In addition, because I'm relatively young I have employees that are older than me and have been here for long time, so it is difficult to change their culture. It is more complex to change habits than to start something from scratch, with new employees this is different because I start immediately with a certain structure and training to security.'

Safety Manager

06) The sensitivity of the issue was considered a major problem by the manager, because of the reasons noted above. It is difficult for him to address health and safety issues with people that don't want to follow instructions because of cultural barriers or age. He explained that for him was a *'daily fight, to address cleverly.'*

2.6.5 Worker participation and involvement

ER102: Is there a permanent committee or working group consisting of members of the management and representatives of the employees dealing with safety and health in this establishment?

There were no issues with this question. There is no internal committee or working group in the company.

ER205: Are employees in this establishment regularly informed about safety and health in the workplace?

The RLS answered yes promptly and had no issues with this question. When asked what he meant by the term 'informed' he said that employees were told how to perform their tasks and what to be careful about.

ER107: How often do controversies related to safety and health arise between the management and the employee representatives? Is this often, sometimes, or practically never the case?

This question was considered straightforward. The RLS believed that there was high level of commitment from the company and safety manager towards H&S, therefore there were never controversies or unresolved issues.

ER150: Do you as the employee representative for safety and health usually get sufficient time off from normal duties to perform these tasks adequately?

There were no issues with this question and the answer was yes.

ER154: Does the management provide you with the necessary information for carrying out your health and safety tasks properly?

There were no issues with this question and the answer was yes.

ER155: Do you usually receive information on time and without having to ask for it?

There were no issues with this question and the answer was yes. From the interview with the safety manager it seems that are well-developed information procedures.

'I do meetings every three months with all employees to talk about health and safety, environment, use and management of the production machines. Everything is written down and all outcomes from these meeting are in the notice board.'

Safety Manager

ER159: On which of the following issues have you or your health and safety representative colleagues received training? 01) Fire safety; 02) Prevention of accidents; 03) Chemical, biological, radiation or dust hazards; 04) Ergonomics; 05) Violence, bullying or harassment; 06) Work-related stress; 07) Discrimination (for example due to age, gender, race or disability)

The RLS said he had received training on all of the topics except discrimination.

ER160: Is this training sufficient or would more training in any of these fields be desirable?

There were no issues with this question and the RLS considered the training sufficient.

2.6.6 OSH and organisational performance

MM402: How would you rate the level of absenteeism in your establishment compared with other establishments in the sector? Is it very high, quite high, about average, quite low or very low?

The safety manager rate the level of absenteeism as very low. However, this was based on absolute levels in the establishment rather than any comparisons with other similar establishments.

How did you arrive at your answer?

'Well, I have people in production that didn't take a day leave for years. When I did the risk assessment I had a look at our data in the last years and the average for public employees, I know that it is not the same but just to have an idea, I couldn't find any other data on private sectors.'

Safety Manager

New question: Compared to other organisations of your size and sector in Italy, how well would you say you perform in terms of health and safety outcomes such as the number of accidents and injuries at work, and the level of sickness absence?'

The safety manager thought they probably performed better than average because they only had two minor accidents in the workplace last year (both due to human error).

'In terms of accidents we had only two accidents, very stupid accidents because human error that shouldn't have happened. All the sickness absence is related to these two accidents. We also had some but during commuting time in the road and in Italy this is considered work related accident, but there is nothing I can do in these cases.'

Safety Manager

MM403: How would you rate the current economic situation of this establishment? Is it very good, quite good, neither good nor bad, quite bad or very bad?

The safety manager said the economic situation of the company was quite good and was confident of his answer.

'I know because we are a very small organisation and I have a management role across sectors, so I know the big picture otherwise, I wouldn't have known.'

Safety Manager

New question: Compared to other organisations of your size and sector in Italy, how well would you say you perform in terms of business outcomes such as profit, turnover or other relevant measures of performance?

The safety manager consider the situation quite good overall, although his answers were different for each example of business outcome.

'If I have to give an average is quite good, although it changes for each indicator. The profit is the same, but the turnover is greater, we work harder to get the same results that we had before the crisis.'

Safety Manager

3 Establishment Overview ID 32109

3.1 Establishment background

The company is a cooperative set up in 1989. They provide a wide range of social services, from care services to people with mental issues and disability, drug issues, difficult backgrounds such as abused mothers with their kids, to childcare services in nurseries.

In total there are 442 employees with permanent contracts and 43 employees with temporary contracts.

The interview was carried out in the headquarters and administrative offices.

The company operates in one region in the north east of Italy and the services are provided in premises scattered across the region. Some of the premises/buildings are owned by the company others by municipalities or hospitals. At the moment the activities are carried out in seven nurseries, 15 residential care homes for people with mental health issues (including severe cases of disabilities) and four residential homes for mothers and their kids.

3.2 Respondent profiles

The manager representative interviewed is the RSPP (*Responsabile del Servizio di Prevenzione e Protezione*, Responsible of the Prevention and Protection Service) and is responsible for the whole management of the H&S system.

He has worked for the cooperative since 2001, as RSPP since 2004. He has completed MAPP training (*Management Aziendale per la Prevenzione e Protezione*, Business Management for Prevention and Safety) and specific courses required by regulations for RSPP and H&S managers.

The employee representative is male, around 30 years old and has worked in the company for the last 12 years. His role involves supporting people with mental health issues and drug addictions. He has been appointed as RLS (*Rappresentante dei Lavoratori per la Sicurezza*, Workers' representative on health and safety) for less than a year, and was elected by his colleagues. He is

also a union rep. He is still doing all the training required by law, 32 hours with an external agency.

3.3 Organisation of health and safety

The SPP (*Serzio di Prevenzione e Protezione*, Prevention and Protection Service) is organised as follows: the safety manager interviewed is the RSPP, responsible for the implementation and monitoring of health and safety procedures; there are four RLSs (by law they are only required to have three) plus two employees that help the manager in his activities; there is one occupational doctor, who is an external consultant.

The manager lamented that he is overstretched with work mainly due to the bureaucratic system and complicated legislation on health and safety, and needs more people working in H&S.

'I need more people working on health and safety only to keep up with the bureaucracy and the legislation. For them (controlling authorities) is more important to have the 'papers' filled in than the problem solved. Whether what is on the papers is actually implemented or is what the workplace needs no-one cares about.'

Safety Manager

The person with penal and administrative liability (the 'owner') is the president of the cooperative. In this case the RSPP has not been delegated with authority to make financial decisions on health and safety (*delega per spega*) but he never had any problems in allocating funds and spends as required. The organisation is certified to ISO 9000.

3.4 Health and safety performance

The company did not complete the proforma.

3.5 Main technical issues

(issues with interpretation of questions, concepts and words; sensitivity of questions; problems in recall or reaching a judgment in answering)

MM156/ER202: In practice, how much of an impact does this policy, management system or action plan have on health and safety in your establishment? Does it have a large impact, some impact, or practically no impact?

Confusion over the meaning of the term 'establishment' made it difficult for the RLS to answer this question. The organisation provides services across different premises that are not owned by them, but mainly by the municipal councils. The RLS interpreted the term 'establishment' as referring to the physical building they work in rather than that particular branch of the organisation. As they do not own

any establishments, he thought this question did not apply. The safety manager said it was important to differentiate between the impact of the policy on how health and safety is managed, impact on physical premises, and the impact on employees. The health and safety management system had been implemented only recently, so there had not been sufficient time for it to impact on employees, but it had led to new improved processes.

It could be useful to specify more clearly what 'establishment' means and have more options to differentiate between impact on physical premises, impact management on system management and impact employees' behaviour and culture.

ER 214: Overall, how would you rate the degree of involvement of the line managers and supervisors in the management of health and safety? Is it very high, quite high, quite low or very low?

The RLS asked whether 'manager' meant the manager of his RLS role (ie the safety manager) or his line manager.

ER210: If the risk assessment or workplace check identifies a need for action: Is the necessary follow-up action taken?

The RLS says that checks are made although the company cannot make the changes. As mentioned above, the interviewee seemed to only consider the checks and risks inherent in the site or building, not employees' tasks or work organisation. This again shows confusion over the term 'establishment'.

'Yes usually yes, but as I said the problem here is that the sites are not owned by the organisations, so we cannot make the changes.'

RLS

MM200/ER250: For each of the following issues, please tell me whether it is of major concern, some concern, or no concern at all in your establishment? 01) Dangerous substances (eg dusts, chemical, biological); 02) Accidents; 03) Noise and vibration; 04) Musculoskeletal disorders; 05) Work-related stress; 06) Violence or threat of violence; 07) Bullying or harassment

The safety manager asked immediately:

'Major concern in which sense? What do you mean exactly?'

Safety Manager

Although the safety manager and the RLS provided consistent answers to the questions and gave the same examples, their interpretations of the word 'concern' were different. For the safety manager a hazard was a major concern if it had a high risk profile, even if it was monitored and controlled. For the RLS a risk was a major concern if it could not easily be controlled, such as violence and random behaviour from patients. Both agreed that a hazard was no concern if it was not present in the workplace.

The safety manager made a point about the unsuitability of the legislative framework on risk control for the social care sector, as it is based on an old-fashioned model of industrial mass-production of goods rather than services. The main risks in their workplace are violence from patients and moving people, neither of which is dealt with well by the legislation.

The safety manager pointed out that the hazards listed have different connotations in different sectors, so the answers to this question only make sense when put in context. For example, violence in the social care sector is more about violent patients, not violence from other employees, whilst accidents are more likely to occur as a result of a fight with a dangerous patient rather than a slippery floor.

MM172: In your establishment, what are the main difficulties in dealing with health and safety? Please tell me for each of the following whether it is a major difficulty, a minor difficulty, or not a difficulty at all. 01) A lack of resources such as time, staff or money; 02) A lack of awareness; 03) A lack of expertise; 04) A lack of technical support or guidance; 05) The culture within the establishment; 06) The sensitivity of the issue

The safety manager asked who he should refer to in answering item 3 (a lack of expertise), whether himself and his team or employees as a whole.

'Lack of expertise from whom? In the sense that I lack of expertise or the employees? If this is related to me and my staff on health and safety I don't think so, in the sense that this is our job and I believe we have all training and knowledge we need, if this relates to the employees, maybe yes.'

Safety Manager

ER159: On which of the following issues have you or your health and safety representative colleagues received training?01) Fire safety; 02) Prevention of accidents; 03) Chemical, biological, radiation or dust hazards; 04) Ergonomics; 05) Violence, bullying or harassment; 06) Work-related stress; 07) Discrimination (for example due to age, gender, race or disability)

The RLS referred to both his training as an employee and his RLS training when answering this question. As the training given to employees in the establishment depends on their specific day job only, it is possible that a different RLS in the establishment would have given different answers.

3.6 Summary of respondents' answers

3.6.1 Approach to management of health and safety

MM155/ER200: Is there a documented policy, established management system or action plan on health and safety in your establishment?'

Both the safety manager and the RLS answered yes, although they referred to slightly different things. The safety manager referred to the documented policy and established management system and explained that the company has a system in place based on guidelines for the OHSAS 18001 (although the company is not yet certified). The RLS referred to a generic system of documents that was in place, such as the statutory risk assessment, rather than the management system or policy.

'We have all docs required by law, risk assessment, all risk plans, and all RLSs can check the docs plus all the docs are on the intranet so employees can look at them.'

RLS

This is probably due to the inexperience of the RLS as he had only recently been elected. He acknowledged this himself and apologised at the beginning of the interview for his poor knowledge on health and safety.

MM156/ER202: In practice, how much of an impact does this policy, management system or action plan have on health and safety in your establishment? Does it have a large impact, some impact, or practically no impact?

As mentioned in the technical section above, the answers to this question were complex. According to the safety manager, the policy had a large impact on health and safety, although he made a differentiation between impact on how the organisation manages health and safety, which was very high, and impact on employees which was to date very low. The management system had been recently implemented, so whilst it now enables him to monitor health and safety and put in place action plans it is yet to impact on employees' behaviour and attitudes (which he explained need to improve).

'Large impact because it allows me to have under control all the needs in terms of actions that need to be taken, including also training and structural problems. At the moment the impact is very high when looking at the organisation on the whole and the management. However, the impact on the employees is still low, because are early days, we still verifying the importance of the system in our organisation.'

Safety Manager

According to the RLS the question didn't apply to them to them as they work in establishments where they do not own the premises (he appears to have

misunderstood the term 'establishment'). The RLS added that the impact is on employees, not on the establishment in itself.

MM159/ER 214: Overall, how would you rate the degree of involvement of the line managers and supervisors in the management of health and safety? Is it very high, quite high, quite low or very low?

Both the safety manager and RLS said the involvement was quite high, although it wasn't clear what involvement meant for them.

The safety manager specified that involvement was quite high, and he referred to his work in trying to bring about a positive and collaborative attitude towards health and safety at all levels of the hierarchical ladder, from the management board to supervisors. Meanwhile the RLS referred mainly to the safety manager when answering this question.

'I think the management board, the directors and some managers of areas, at the moment they are around 15 people. There is collaboration on health and safety management, it has been difficult to change the culture in the sense that now they are starting to see prevention as convenient from a business point of view. My strategy to change their culture is information, internal discussions about real cases, it is a long process but slowly we are getting there.'

Safety Manager

'Do you mean my manager as RLS? It is high for our safety manager; I can freely talk to him about everything.'

RLS

ER215_05: Please tell me whether you agree (1), neither agree nor disagree (2), or disagree (3) with the following statement: 'Our management gives proper consideration to occupational safety and health issues raised by employee or their representatives'

The RLS agreed with the statement. Proper consideration for him meant that the safety manager took seriously complaints from employees (although he said that often the problem was from employee side, as some didn't have the right culture or attitude to health and safety).

3.6.2 Risk Assessment

MM161/ER207: Are workplaces in the establishment regularly checked for safety and health as part of a risk assessment or similar measures?

Both the safety manager and RLS found this question straightforward and said the workplaces are regularly checked as part of the risk assessment process. For this organisation the check relates to controls on employee behaviour only where the sites are owned by other public administrations.

‘Yes, as part of the risk assessment which is part of a management system. We are now working towards a risk assessment that has a general part and for each building and areas a more specific risk assessment documents. The different sites are checked fairly regularly, we aim to have a system where there is a systematic and regular assessment of all sites, areas and buildings.’

Safety Manager

What does ‘regularly’ mean to you?

‘Annually, at least minimum once per year. There are services where checks need to be done more frequently but for me regularly is at least once per year.’

Safety Manager

MM162: Are these risk assessments or workplace checks mostly conducted by your own staff or are they normally contracted to external service providers?

There were no issues with this question. The checks are mostly conducted by the safety manager, although in case of more technical issues he calls in external experts.

MM163: On which occasions are these risk assessments or workplace checks carried out?01) Following a change in the staffing, layout or organisation of work; 02) At the request of employees eg in case of complaints; 03) At regular intervals, without any specific cause

There were no issues with this question.

01) The checks are carried out mainly when there is a change in working site, depending on where the company wins the work.

02) Yes, there had been occasions when the employees asked for specific controls so the safety manager ran a check.

03) In this case the safety manager said no, although he may have misheard it as ‘more regularly’ (in the previous question he said the checks were done at least once per year).

‘We would want to do it at regular intervals but at the moment we don’t have the capacity we are working towards it. We do it for some controls but not for all.’

Safety Manager

MM164: Which of the following areas are routinely considered in these checks? 01) Equipment and working environment; 02) The way work is organised; 03) Irregular or long working hours; 04) Supervisor-employee relationships

There were no issues with this question.

01) and 02) are both routinely considered in the risk assessment.

03) The manager explained that irregular or long working hours is a big problem in the company, because of the type of work they win from public administrations. For example, some of their work involves providing care services to severely disabled people on a 24/7 base. Although he tries to take the issue into account in the risk assessment he feels powerless to address this.

'The organisation of the working hours is not up to us, it is often related to the organisation from which we win the work, is very hard for us to change attitudes and culture of external organisations... Now with the crisis it is becoming more difficult to negotiate with the public authorities.'

Safety Manager

04) The relationship between supervisor and employees is not checked.

What do you understand by the term 'the way work is organised'?

'The percentage of part-time in the services, the right shifts, the possibility of guarantee an adequate workload that is not too heavy or not enough to cover the monthly hours.'

MM166: And which of the following actions have been taken as a follow-up to these checks? 01) Changes to equipment or working environment; 02) Changes to the way work is organised; 03) Changes to working time arrangements; 04) Provision of training

This question was considered straightforward.

Actions have included 01) changes to equipment or working environments, 02) Changes to the way work is organised after workplace checks and risk assessment.

02) No changes have been made to the working time arrangements, although they have big issues with this, because this is set by the funding body.

04) Yes, although the provision of training is not only a consequence of workplace checks or risk assessment; there is high attention to training to enable social care workers to deal with violence from patients.

'The training for us is a priority. Many of our risks cannot be controlled because they depends on our patients, for this the correct training is crucial'

Safety Manager

ER209: Do you have a say in the decisions on when and where these risk assessments or workplace checks are carried out?

The RLS considered this question straightforward. He said that the safety manager involved him in decisions during checks, but thought that his own contribution was limited at the moment by his inexperience in the role.

ER210: If the risk assessment or workplace check identifies a need for action: Is the necessary follow-up action taken?

The RLS said that checks are made but that the company could not make changes to the building premises as these are not owned by the organisation (see earlier section on issues).

ER211: And are you as health and safety representatives usually involved in the choice of follow-up actions?

There were no issues with this question. The RLS answered yes, although as in ER209 thought that his contribution to these discussions was limited by his inexperience.

3.6.3 Levels of concern with occupational safety and health risks

MM200/ER250: For each of the following issues, please tell me whether it is of major concern, some concern, or no concern at all in your establishment? 01) Dangerous substances (eg dusts, chemical, biological); 02) Accidents; 03) Noise and vibration; 04) Musculoskeletal disorders; 05) Work-related stress; 06) Violence or threat of violence; 07) Bullying or harassment

01) Dangerous substances: both the safety manager and the RLS said that these are some concern (concern is a low level because they do not use many dangerous substances, however there is attention towards cleaning products such as bleach etc.)

02) Accidents are a major concern for the safety manager and the RLS because there is always a possibility that an accident will occur.

03) Noise and vibration are no concern at all because the risks are not present in the workplace.

04) Musculoskeletal disorders are a major concern, due to the type of job (social care involves moving people that are often immobile). This is exacerbated by the aging workforce.

‘Yes, this is definitely a major concern. About musculoskeletal issues there is a great attention for both the type of activity that we do and the ageing workforce. For example last year, we dedicated the health and safety internal campaign mainly to this type of risks. The biggest problem here is

the ageing workforce, mainly due to two factors: the fact that in previous years this aspect wasn't taken into account in terms of risk assessment and procedures, good practices; the result is that now we have workers that are used to work in an unsafe way. The other problem is the increase of the average age of the workforce, there is a number of members around fifty now and they have a limited range of activities that they can perform with reference to moving and lifting patients.'

Safety Manager

05) Work-related stress is a major concern due to the fact that they deal with difficult patients and work unsocial hours. The safety manager explained that stress control and monitoring was one of their top priorities even before it was made compulsory. They are collaborating with PhD students working on stress, and they are now part of a stress monitoring project with the university.

06) Violence or threat of violence is a major concern because of the risk of attacks from patients. It is not possible to avoid this risk, so all they can do is train employees in how to deal with these situations.

07) Bullying or harassment are considered some concern by the safety manager, again in relation to the employees rather than the patients. The RLS said these are no concern at all.

3.6.4 Drivers of and barriers to management of health and safety

MM171: In your establishment, how important are the following reasons for addressing health and safety? For each one, please tell me whether it is a major reason, a minor reason, or no reason at all. 01) Fulfilment of legal obligation; 02) Requests from employees or their representatives; 03) Staff retention and absence management; 04) Economic or performance-related reasons; 05) Requirements from clients or concern about the organisation's reputation; 06) Pressure from the labour inspector

There were no issues with this question.

01) Fulfilment of legal obligation and 02) requests from employees were both major reasons.

03) Staff retention was a minor reason because employees are members of the cooperative and the majority of them have been in post for around 20 years.

04) Economic or performance-related reasons were minor reasons; members still don't understand the link between safety and performance.

05) Requirements from clients were a major reason but not concern about the reputation of the organisation.

06) Pressure from labour inspectors was a minor reason. They have a collaborative relationship with the labour inspector and the safety manager often calls them for advice.

MM172: In your establishment, what are the main difficulties in dealing with health and safety? Please tell me for each of the following whether it is a major difficulty, a minor difficulty, or not a difficulty at all. 01) A lack of resources such as time, staff or money; 02) A lack of awareness; 03) A lack of expertise; 04) A lack of technical support or guidance; 05) The culture within the establishment; 06) The sensitivity of the issue

01) A lack of resources was considered a minor difficulty

02) A lack of awareness amongst middle managers was considered a major difficulty.

'May be not from my side and those involved in health and safety, there is lack of awareness in the middle managers, those that are between the directors and the employees. There is more awareness now compared to few years ago but I still need to work on it.'

Safety Manager

03) A lack of expertise amongst employees was considered a major difficulty, but from his side only a minor difficulty

'Lack of expertise from whom? In the sense that I lack of expertise or the employees? If this is related to me and my staff on health and safety I don't think so, in the sense that this is our job and I believe we have all training and knowledge we need, if this relates to the employees, may be yes.'

Safety Manager

04) A lack of technical support or guidance was considered a minor difficulty.

05) The culture within the establishment was considered a major difficulty.

06) The sensitivity of the issue was considered a major difficulty due to the fact that they work with people from difficult backgrounds, and this made the health and safety are also a sensitive issue meanly when dealing with difficult or violent patients.

'Yes, this is important because we work with people not with machines. You know machines can be changed, but we work with people we try to improve people's lives therefore it is important to have the right approach on some issues.'

Safety Manager

[See section on issues]

3.6.5 Worker participation and involvement

ER102: Is there a permanent committee or working group consisting of members of the management and representatives of the employees dealing with safety and health in this establishment?

There were no problems with this question. The RLS said there is no permanent committee or working group.

ER205 : Are employees in this establishment regularly informed about safety and health in the workplace?

The answer from the RLS was yes, although he limited the answer to the training received on health and safety rather than more general information.

ER107: How often do controversies related to safety and health arise between the management and the employee representatives? Is this often, sometimes, or practically never the case?

There were no issues with this question. The RLS said ‘practically never’ because the safety manager collaborates well with the employees.

‘So far never happened in the sense that we’ve always talked about everything and found a common agreement’

RLS

ER150: Do you as the employee representative for safety and health usually get sufficient time off from normal duties to perform these tasks adequately?

The RLS found this question straightforward and answered yes.

ER154: Does the management provide you with the necessary information for carrying out your health and safety tasks properly?

The RLS found this question straightforward and answered yes. There is good collaboration between the safety manager and the RLS and he is involved in all processes.

ER155: Do you usually receive information on time and without having to ask for it?

The RLS found this question straightforward and answered yes.

ER159: On which of the following issues have you or your health and safety representative colleagues received training? 01) Fire safety; 02) Prevention of accidents; 03) Chemical, biological, radiation or dust hazards; 04) Ergonomics; 05) Violence, bullying or harassment; 06) Work-related stress; 07) Discrimination (for example due to age, gender, race or disability)

01) Yes.

02) Yes, as the RLS and as an employee. All employees do different courses on accidents according to the risk profile of their job.

03) No because there is no risk.

04) No as the RLS but yes as an employee.

04) No as the RLS but yes as an employee.

06) Yes, as an RLS.

07) No because there is no risk .

ER160: Is this training sufficient or would more training in any of these fields be desirable?

The RLS found this question straightforward. He thought that more specific training would be desirable as the basic training for an RLS is only about the legislation.

'The training we did was more about legislation, moving but it was very general and we needed this as RLS to know now what to do in general, but we will need more specific training.'

RLS

3.6.6 OSH and organisational performance

MM402: How would you rate the level of absenteeism in your establishment compared with other establishments in the sector? Is it very high, quite high, about average, quite low or very low?

The safety manager found this question straightforward. He rated it as very low, based on his discussions with other safety managers in the sector.

New question: Compared to other organisations of your size and sector in Italy, how well would you say you perform in terms of health and safety outcomes such as the number of accidents and injuries at work, and the level of sickness absence?’

The safety manager found this question straightforward and rated it as better than average.

MM403: How would you rate the current economic situation of this establishment? Is it very good, quite good, neither good nor bad, quite bad or very bad?

The safety manager found this question straightforward. He believed it was neither good nor bad; the economic crisis has affected the sector but they are surviving and doing better than others.

New question: Compared to other organisations of your size and sector in Italy, how well would you say you perform in terms of business outcomes such as profit, turnover or other relevant measures of performance?

The safety manager found this question straightforward. Compared to other organisations their performance is quite good.

4 Establishment Overview ID 41809

4.1 Establishment background

The organisation is a large company in the energy sector, with approximately 3,200 employees between Europe, Africa and the Middle East. It is one of the most important Italian operators in the procurement, production and marketing of electric power, natural gas and crude oil.

The interview was carried out at the headquarters, where there is staff working in a range of administrative, marketing, and research functions

4.2 Respondent profiles

The safety manager has worked in the company since 1999, and since 2009 has been responsible for quality assurance in health and safety. He has responsibility for implementing and monitoring all health and safety (H&S) systems in the company and co-ordinating all functions and business units in H&S issues. He also manages the use of occupational doctors and is responsible for internal training in H&S. He manages a team of five people.

The employee rep has worked in the company since the end of the 1990s. His day job involves the exploration of hydrocarbon. He is also the union rep. and RLS (*Rappresentante dei lavoratori per la sicurezza*, Workers Representative for health and safety) for the site of the headquarters. He was elected for this role in 2004.

Given the role of the safety manager in the company, the interview with the management representative was not about H&S at the site but across the organisation as a whole. The interview with the RLS focussed on the headquarters only.

4.3 Organisation of health and safety

The company is certified OHSAS 18001 and all health and safety procedures are implemented according to these guidelines. The directors of each unit are legally responsible for H&S in their respective areas, but cascade responsibilities to

operational managers, who are supported by occupational doctors and other technical figures.

Where the company doesn't have the internal expertise they use external consultancy companies (eg for the identification and measurement noise levels). The design and implementation of the health and safety management system has also been supported by external experts.

4.4 Health and safety performance

According to the proforma there are 110 managers and senior officials and 350 employees with health and safety responsibilities across the company. Area managers of operational sites spend 16 hours per month on H&S, site managers four hours and supervisors 32 hours.

The information provided in table 3 of the proforma was not clear. Total costs for H&S were €8,280k and total investments €5,512k. These figures referred to the all company including probably major investments.

Table 5 was on accidents and ill-health was completed for all employees without separating out managers and senior officials. There were ten accidents in 2011. Total number of working days lost due to work-related accidents and ill health in 2011 was 247 (equivalent to 1.9 per cent of working time). No days were lost due to ill-health.

4.5 Main technical issues

(issues with interpretation of questions, concepts and words; sensitivity of questions; problems in recall or reaching a judgment in answering)

MM156/ER202: In practice, how much of an impact does this policy, management system or action plan have on health and safety in your establishment? Does it have a large impact, some impact, or practically no impact?

Although the safety manager provided concrete examples about the impact of the policy (for example, fewer accidents, better implementation of the management system), he found the term 'impact' difficult to define in relation to H&S.

'It is difficult to say and define impact, first because in this organisation by nature we think about the impact on the environment and second because it is complex in itself to identify impact.'

Safety Manager

MM159/ER 214: Overall, how would you rate the degree of involvement of the line managers and supervisors in the management of health and safety? Is it very high, quite high, quite low or very low?

Both respondents answered 'quite high' to this although they both noted that it varies across the organisation with a high degree of involvement at top level but low involvement from middle managers.

'I say quite high and not very high because I personally believe that there is still a difference between what is on paper and what is on reality. The policy that is designed by the top management can be perfect on paper and from a legislative point of view, but then there is a discrepancy with how this is implemented on the ground. The problem is the middle managers in the sense that they are those that have to lead by example and make sure that the policy is implemented correctly and monitor the situation. You have to have them on board to guarantee the results and transform the policy in practices and behaviour. There is still work to do on this.'

Safety Manager

ER215_05: Please tell me whether you agree (1), neither agree nor disagree (2), or disagree (3) with the following statement: 'Our management gives proper consideration to occupational safety and health issues raised by employee or their representatives.'

According to the RLS this question is not appropriately worded and doesn't provide enough response options to explain what happens in practise. The wording 'gives consideration' is too general so the question doesn't ask whether these issues are raised.

'This question is difficult to answer. None of them applies to my situation. For example if there is a problem, as we have, and they take action but then they say that they [have done sufficient to] respect the legislation, you cannot say that the company is not acting upon it, or they are not giving proper consideration. But at the same time if they really wanted to solve the problem they could go beyond what the legislator asks for.'

RLS

MM162: Are these risk assessments or workplace checks mostly conducted by your own staff or are they normally contracted to external service providers?

The safety manager told how risk assessments and workplace checks are two separate processes. The former is required by law and is extremely complex for an organisation as large as this, so requires input from external contractors. On the contrary workplace checks are always carried out by internal employees.

'On the one hand you have the risk assessment document, which is complicated on its own, 500 pages for this site only, but we try to make it applicable to our working environment and risks, which is a long process.'

Then the real problem is that as soon as you finish your risk assessment document, it is already history. We have issues to cover and situations every single day, so we need to have flexible procedures and documents that are 'alive' as well.'

Safety Manager

MM163: On which occasions are these risk assessments or workplace checks carried out?

01) Following a change in the staffing, layout or organisation of work; 02) At the request of employees eg in case of complaints; 03) At regular intervals, without any specific cause

This question was asked with respect to the legal risk assessment. The safety manager said no to item 02) but later explained that more informal workplace checks are often done if an employee complains or notice something wrong. It is important for this question to specify whether it concerns the risks assessment or checks.

MM166: And which of the following actions have been taken as a follow-up to these checks?

01) Changes to equipment or working environment; 02) Changes to the way work is organised; 03) Changes to working time arrangements; 04) Provision of training

The safety manager said no to item 04) but did not appear to understand this part of the question. His answer was unclear and confused unrelated to the question.

MM200/ER250: For each of the following issues, please tell me whether it is of major concern, some concern, or no concern at all in your establishment?

01) Dangerous substances (eg dusts, chemical, biological); 02) Accidents; 03) Noise and vibration; 04) Musculoskeletal disorders; 05) Work-related stress; 06) Violence or threat of violence; 07) Bullying or harassment

The answers from the safety manager and RLS to these questions were often inconsistent. This was partly because the safety manager provided answers at the corporate level, while the RLS answered from the point of view of that site, the headquarters. For example, Dangerous substances were of some concern to the safety manager and no concern at all to the RLS (the latter was referring to the office-based headquarters where no such risks were present). There also appeared to be some social desirability bias in the safety manager's responses, as he seemed very careful in providing the 'right answer'.

MM171: In your establishment, how important are the following reasons for addressing health and safety? For each one, please tell me whether it is a major reason, a minor reason, or no reason at all.'

01) Fulfilment of legal obligation; 02) Requests from employees or their representatives; 03) Staff retention and absence management; 04) Economic or performance-related reasons; 05) Requirements from clients or concern about the organisation's reputation; 06) Pressure from the labour inspector.

Item 04) economic or performance-related reasons did not appear to be well understood. The safety rep thought this was about having insufficient funds to deal with health and safety rather than the positive impact of health and safety on financial performance.

'Economic or performance-related reasons are minor in the sense that this has never been a barrier, we never had a problem that we didn't address because of money'

Safety Manager

ER102: Is there a permanent committee or working group consisting of members of the management and representatives of the employees dealing with safety and health in this establishment?

The RLS asked the interviewer to repeat the question and then what was meant by 'permanent committee or working group'.

ER107: How often do controversies related to safety and health arise between the management and the employee representatives? Is this often, sometimes, or practically never the case?

The RLS pointed out that the term 'controversies' made him think of legal disputes and therefore could be too strong for this question.

'Well, controversies is not the right word, seems that there are legal actions with them. Let's say we have open issues, but not controversies'

RLS

ER205: Are employees in this establishment regularly informed about safety and health in the workplace?

The RLS said employees are informed although he found difficult to understand what we meant by 'informed'.

'Yes, There is some information, we have intranet where we can access some info. But is difficult to say, what is meant by information? I provide information, for example, as RLS, the doctors provide some information. Yes let's say there is information'

RLS

4.6 Summary of respondents' answers

4.6.1 Approach to management of health and safety

MM155/ER200: Is there a documented policy, established management system or action plan on health and safety in your establishment?'

Yes, according to both the safety manager and the RLS there is a policy on health and safety which covers all sites of the company. The company is certified to OHSAS 18001.

MM156/ER202: In practice, how much of an impact does this policy, management system or action plan have on health and safety in your establishment? Does it have a large impact, some impact, or practically no impact?

Both respondents rated the policy as having a large impact. The safety manager told how the company has seen a significant reduction in the level of accidents over time due to the introduction of a systematic approach to H&S across the organisation.

'There is large impact both because there is a strong health and safety culture in the organisation, there has always been, and because in the last years all certifications have led to structure this culture already existing into a system management. If you look at the decreasing trends of accidents, all people in the company would say that this is the result of the culture of the company but also of the implementation of organized system.'

Safety Manager

MM159/ER 214: Overall, how would you rate the degree of involvement of the line managers and supervisors in the management of health and safety? Is it very high, quite high, quite low or very low?

Both respondents answered 'quite high' to this, although they both noted that it varies across the organisation with a high degree of involvement at top level but low involvement from middle managers. The company is providing special training and campaigns to ensure middle managers better understand their roles and responsibilities in relation to health and safety.

'We are an old company and sometimes it is difficult to change old habits and culture. For this reason we are working on specialised training, awareness campaigns to bring about the cultural changes that we need'

Safety Manager

ER215_05: Please tell me whether you agree (1), neither agree nor disagree (2), or disagree (3) with the following statement: ‘Our management gives proper consideration to occupational safety and health issues raised by employee or their representatives’

The RLS did not answer this because he disliked the use of the term ‘controversies’ (see section on technical issues).

4.6.2 Risk Assessment

MM161/ER207: Are workplaces in the establishment regularly checked for safety and health as part of a risk assessment or similar measures?

Both the safety manager and RLS replied that all places are regularly checked as part of the risk assessment. They both made the point that performing the risk assessment (required by law in Italy) is not necessarily a guarantee of good and effective health and safety procedures and behaviour on the ground. The company performs the statutory risk assessment, but it’s the programme of checks that they set up themselves that really helps them address any issues that arise.

‘Yes, absolutely all sites have the risk assessment document although to be honest this is just document to make the legislator happy. Our risk assessment policies and documents are dynamic in the sense that there are always things to check and to change as the world of the work is a moving object and dynamic environment. We are constantly working to improve our assessment capacity.’

Safety Manager

MM162: Are these risk assessments or workplace checks mostly conducted by your own staff or are they normally contracted to external service providers?

The safety manager said the risk assessments are mostly conducted by their own staff, although they call in external consultants for some specialist testing.

MM163: On which occasions are these risk assessments or workplace checks carried out?’

01) Following a change in the staffing, layout or organisation of work; 02) At the request of employees eg in case of complaints; 03) At regular intervals, without any specific cause.

The safety manager said yes to items 01) and 03) and no to item 02) with the explanation that the company has highly standardised procedures that they follow.

‘No we don’t do risk assessment at request of an employee because we have a quite standard type of work organisation. If there are changes these

are usually covered by the first item. But it could happen if an employee asks for it.'

Safety Manager

MM164: Which of the following areas are routinely considered in these checks?

01) Equipment and working environment; 02) The way work is organised; 03) Irregular or long working hours; 04) Supervisor-employee relationships

This question was considered straightforward. The company routinely considered 01) equipment and working environment; 02) the way work is organised; and 03) irregular or long working hours; but not 04) supervisor-employee relationships. He explained how Italy still takes an old-fashioned approach to health and safety.

'Well it depends what you mean by regular checks on this [supervisor-employee relationship], well I would say no. It is not a formal process included in the risk assessment, it is more a grey area of training and raising awareness amongst employees and managers. In Italy, there is no concept of feedback and assessment of managers' performance from an HR point of view, we are still far from this culture.'

Safety Manager

MM166: And which of the following actions have been taken as a follow-up to these checks?

01) Changes to equipment or working environment; 02) Changes to the way work is organised; 03) Changes to working time arrangements; 04) Provision of training

The safety manager said that changes had been made to all items apart from 04) provision of training. There is a separate process for determining training needs.

ER209: Do you have a say in the decisions on when and where these risk assessments or workplace checks are carried out?

The RLS found this question straightforward. He said that yes, he is able to make all the checks he wants.

'Yes, I'm free to go and check everything I want. If there is something wrong I can go or ask the safety manager to come with me.'

RLS

ER210: If the risk assessment or workplace check identifies a need for action: Is the necessary follow-up action taken?

There were no issues with this question. The RLS said that action is usually taken but complained that some problems had not been resolved.

'Let's say that there is good will, but this is not enough to solve problems'

RLS

ER211: And are you as health and safety representatives usually involved in the choice of follow-up actions?

There were no issues with this question. The RLS said that they are involved, particularly if they are the ones who highlighted the problem in the first place. They also sign the risk assessment documents, although this was considered just a tick box exercise; the document is so vast and technical that they cannot read it thoroughly.

4.6.3 Levels of concern with occupational safety and health risks

MM200/ER250: For each of the following issues, please tell me whether it is of major concern, some concern, or no concern at all in your establishment?

01) Dangerous substances (eg dusts, chemical, biological); 02) Accidents; 03) Noise and vibration; 04) Musculoskeletal disorders; 05) Work-related stress; 06) Violence or threat of violence; 07) Bullying or harassment

01) Dangerous substances were of some concern to the safety manager and no concern at all to the RLS (the latter was referring to the office-based headquarters where no such risks are present).

02) Accidents were a major concern to the safety manager because they try to keep the level low. For the RLS, accidents were only of some concern because the likelihood of having accidents in an office was low.

'Although we have a very low level of accidents there is always a great attention on this topic and near misses.'

Safety Manager

03) Noise and vibration were of some concern to the safety manager who thought these were generally under control. However, the RLS said these were a major concern. The headquarters is close to the underground, so there are regularly problems with noise and vibration in the office. The RLS also complained that they have no evacuation procedures in case of earthquakes (more of an issue since the earthquake last year).

04) Musculoskeletal disorders were of some concern to the safety manager and a major concern to the RLS. The safety manager said that MSDs only affect those that are office based and the risks are under control.

'Yes this is a topic that we take under control because a great part of our employees work in front of the computers or machines, so the occupational doctors monitor it closely. Although we don't have many cases and they are often problems brought from outside or related to external issues. Then this is a topic that with an ageing population you need to monitor'

Safety Manager

05) Work-related stress was of some concern to the safety manager and a major concern to the RLS. The RLS explains that insufficient space in the headquarters was causing stress for staff.

06) Violence or threat of violence was of no concern to either the safety manager or RLS.

07) Bullying or harassment was of no concern to the safety manager and of some concern to the RLS. The safety manager was not aware of any complaints from staff, while the RLS knew of employees who complained of being ostracised by their managers, and of having their opportunities for promotion blocked.

'It not an open abuse, if they prevent you from developing your career in a systematic way for me this is harassment and bullying, they do this to quietly push you out.'

RLS

4.6.4 Drivers of and barriers to management of health and safety

MM171: In your establishment, how important are the following reasons for addressing health and safety? For each one, please tell me whether it is a major reason, a minor reason, or no reason at all.'

01) Fulfilment of legal obligation; 02) Requests from employees or their representatives; 03) Staff retention and absence management; 04) Economic or performance-related reasons; 05) Requirements from clients or concern about the organisation's reputation; 06) Pressure from the labour inspector.

01) Fulfilment of legal obligation, requests from employees or their representatives, 03) staff retention and absence management, 05) requirements from clients and 06) pressure from the labour inspector were all considered major reasons for addressing health and safety issues. Economic or performance-related reasons were considered minor in the sense that budget constraints do not impact on health and safety investments (the safety rep appeared to misunderstand this item, see technical section).

MM172: In your establishment, what are the main difficulties in dealing with health and safety? Please tell me for each of the following whether it is a major difficulty, a minor difficulty, or not a difficulty at all.'

01) A lack of resources such as time, staff or money; 02) A lack of awareness; 03) A lack of expertise; 04) A lack of technical support or guidance; 05) The culture within the establishment; 06) The sensitivity of the issue

There were no issues with this question. 01) A lack of resources such as time, staff or money was considered a minor difficulty. 03) A lack of expertise, 04) a lack of technical support, and 06) the sensitivity of the issue were not perceived as

difficulties. 02) A lack of awareness and 05) the culture within the establishment were all perceived as a major difficulties, mainly amongst middle managers.

4.6.5 Worker participation and involvement

ER102: Is there a permanent committee or working group consisting of members of the management and representatives of the employees dealing with safety and health in this establishment?

The RLS said that a new committee had been formed on a temporary basis to address the new procedures for the work-related stress assessment, but there was nothing permanent in place.

ER205 : Are employees in this establishment regularly informed about safety and health in the workplace?

Yes, employees are informed about health and safety through the intranet, the RLS, management and the doctor.

ER107: How often do controversies related to safety and health arise between the management and the employee representatives? Is this often, sometimes, or practically never the case?

The RLS stated that issues sometimes arise, but thought the word ‘controversies’ was too strong to describe these (see section on issues).

ER150: Do you as the employee representative for safety and health usually get sufficient time off from normal duties to perform these tasks adequately?

This question was considered straightforward. The RLS answered no and lamented that there wasn’t enough time for him to perform his duties as RLS.

‘No, I don’t think so. We still have to do our jobs, so responsibilities as RLS need to be carried out almost in our free time.’

RLS

ER154: Does the management provide you with the necessary information for carrying out your health and safety tasks properly?

This question was considered straightforward but the RLS answered no. Whilst he is given information to allow him to sign the risk assessment document, and all related legal requirements, there is little information for going beyond this.

ER155: Do you usually receive information on time and without having to ask for it?

This question posed no issues. The RLS answered yes to it.

ER159: On which of the following issues have you or your health and safety representative colleagues received training? 01) Fire safety; 02) Prevention of accidents; 03) Chemical, biological, radiation or dust hazards; 04) Ergonomics; 05) Violence, bullying or harassment; 06) Work-related stress; 07) Discrimination (for example due to age, gender, race or disability)

The RLS found this question straightforward. As an RLS he had only received training on work-related stress. As employee he did not receive training in other areas, according to the interviewee all the training received had come from the union, not the company.

'These are issues that have been discussed within the company but we haven't done structured training in a formal situation. I do the training through the union, but in this company we don't do training anymore, is one of those problems that you cannot solve because you cannot pinpoint the problem. Is not that they say no, there are other ways of stopping you from doing what you need.'

RLS

ER160: Is this training sufficient or would more training in any of these fields be desirable?

The RLS found this question straightforward said that more training would be desirable.

ER162: Which of the following are the main reasons for receiving no or not sufficient training on these issues?

01) Difficulties to get time off for such training; 02) Lack of information about available courses; 03) Available courses are not appropriate for our situation; 04) Difficulties to get the financial resources for the training.

There were no issues with this question. The main reasons for not receiving training were: 1) difficulties to get time off for such training and 2) lack of information about available courses.

4.6.6 OSH and organisational performance

MM402: How would you rate the level of absenteeism in your establishment compared with other establishments in the sector? Is it very high, quite high, about average, quite low or very low?

There were no issues with this question. The safety manager rated the level of absenteeism as very low. This was based on a benchmarking exercise they had recently performed. In this case absenteeism included only days off for illnesses, excluding injuries and strikes.

'We have just finished a study and we found out that we have the lowest absenteeism in our sector. Although we don't know why. I'm talking about absenteeism for illnesses only, excluding the work related absenteeism such as for injuries and also excluding the strikes.'

New question: Compared to other organisations of your size and sector in Italy, how well would you say you perform in terms of health and safety outcomes such as the number of accidents and injuries at work, and the level of sickness absence?'

There were no problems with this question. The safety manager distinguished between the national average and the sectoral average. He thought the company performed better than the national average (probably because they have a highly standardised approach) but were about average for the sector.

'Better than the Italian average and on the average o the sector, we do benchmarking with our competitors or other companies in our sector'

Safety Manager

MM403: How would you rate the current economic situation of this establishment? Is it very good, quite good, neither good nor bad, quite bad or very bad?

Again there were no issues. The safety manager rated them as quite good.

New question: Compared to other organisations of your size and sector in the Italy, how well would you say you perform in terms of business outcomes such as profit, turnover or other relevant measures of performance?

Again there were no issues. The safety manager rated them as quite good.

5 Establishment Overview ID 52609

5.1 Establishment background

The organisation is a public-sector foundation based in the north of Italy. It provides technical support to a local university, for example in restructuring works, in running classes and setting up technical equipment. The company is based at just one site and has ten employees, all of whom are on permanent contracts.

5.2 Respondent profiles

The person interviewed as a management representative is an external consultant and the RSPP (*Responsabile del Servizio di Prevenzione e Protezione*, Responsible for the Prevention and Protection Service) for the foundation. He has held this role since 1996 and is responsible for the implementation of health and safety (H&S) procedures in the organisation and compliance with the law. He is also the external consultant for fire prevention and certifications of the building. In addition to the foundation he is RSPP for 18 municipalities and 20 schools. As an external consultant, the interviewee found it difficult to answer some of the questions about the drivers and barriers to health and safety in the establishment.

The RLS (*Rappresentante dei lavoratori per la sicurezza*, Workers' representative for health and safety) started working at the foundation in 2005 but was appointed RLS in the last year. The RLS is an architect and technician. The interview with the RLS was not very informative as he was more intent in showing that they comply with the legislation than explaining how things work in practice.

5.3 Organisation of health and safety

The organisation of health and safety in the foundation is very simple: the 'owner' (with penal and administrative liability) is the president of the foundation (although this is more of an honorary title as the president has never been there). The RSPP is an external consultant. No managers (*dirigenti*) are in charge of health and safety duties, but two employees have supervisory responsibilities on have health and safety (*preposti*).

5.4 Health and safety performance

The organisation did not complete the proforma.

5.5 Main technical issues

(issues with interpretation of questions, concepts and words; sensitivity of questions; problems in recall or reaching a judgment in answering)

MM155/ER200: Is there a documented policy, established management system or action plan on health and safety in your establishment?’

Both interviewees answered yes they had a policy, but by policy they referred to generic documents on health and safety such as documents on emergency procedures. Whilst the manager talked about a management system for health and safety which he considered adequate to the needs of the organisation, the RLS said that no such system existed in the establishment. It may worth providing a quick example of what is meant by the term ‘policy’.

MM161/ER207: Are workplaces in the establishment regularly checked for safety and health as part of a risk assessment or similar measures?’

This question is open to interpretation. For example, the safety manager responded ‘yes, twice per month’ to this, referring to his regular visits to the site during which he usually ‘has a look around’. In contrast, the RLS said ‘yes, twice per year’, as he was referring to the checks on fire alarms and equipment.

MM164: Which of the following areas are routinely considered in these checks?01) Equipment and working environment; 02) The way work is organised; 03) Irregular or long working hours; 04) Supervisor-employee relationships

This question appears to be subject to social desirability bias. The safety manager said yes to everything but refused to explain what they did in terms of item 4, supervisor- employee relationships and later explained that there are no irregular or long working hours (item 3). It is possible that, as an external consultant, he was particularly keen to show that everything is being done to meet the legislation.

MM166: And which of the following actions have been taken as a follow-up to these checks? 01) Changes to equipment or working environment; 02) Changes to the way work is organised; 03) Changes to working time arrangements; 04) Provision of training.

In item 02) and 04) the interviewees answered yes the changes to the way work was organised and the provision did not appear as resulted from risks assessment.

MM200/ER250: For each of the following issues, please tell me whether it is of major concern, some concern, or no concern at all in your establishment? 01) Dangerous substances (eg dusts, chemical, biological); 02) Accidents; 03) Noise and vibration; 04) Musculoskeletal disorders; 05) Work-related stress; 06) Violence or threat of violence; 07) Bullying or harassment

The safety manager's interpretation of 'concern' was initially whether risks were 'paid attention to' so hazards were a concern if they were things they had to think about. For example, he said that accidents were a major concern even though the chance of having an accident in an office environment was considered low.

'This is a type of job where is difficult to have an accident but of course there is attention on this. The right word is not concern but attention.'

Safety Manager

However, when he got to item 4 he changed his mind about what the question was asking.

'Now I'm starting to understand what you mean by concern, you mean that the risk assessment has found some problems that cause concern rather than giving attention to something, because you are asking about the different areas of the risk assessment document. While I thought that you were asking whether the idea of having accidents etc... would cause concern, would worry us.'

Safety Manager

Meanwhile, the RLS thought the question was about whether he felt unsafe or uneasy about the approach being taken.

MM171: In your establishment, how important are the following reasons for addressing health and safety? For each one, please tell me whether it is a major reason, a minor reason, or no reason at all.

01) Fulfilment of legal obligation; 02) Requests from employees or their representatives; 03) Staff retention and absence management; 04) Economic or performance-related reasons; 05) Requirements from clients or concern about the organisation's reputation; 06) Pressure from the labour inspector

The management representative, as an external consultant, wasn't able to answer all of the questions so would have liked a 'don't know' response option. There was also concern about the use of two terms in the question, firstly asking how 'important' the issues are and secondly asking to rate how much of a priority it is.

'The money has been a huge problem in the past when the account manager didn't want to invest money in the health and safety. Now it is less of a problem, it is important but is not a priority, you know money is never enough... A priority means that has a priority over everything and need to be done immediately doesn't matter what. Important means that yes it is important but can wait.'

Safety Manager

ER102: Is there a permanent committee or working group consisting of members of the management and representatives of the employees dealing with safety and health in this establishment?

The RLS asked this question to be repeated and appeared to be confused over what was meant by permanent committee or working group.

ER154: Does the management provide you with the necessary information for carrying out your health and safety tasks properly?

The interviewee replied yes to this, but his answer was more about whether management deal with health and safety issues raised by employees than pass on the necessary information.

'Let's say if we ask for something at least they listen to it and sooner or later they give us an answer to the problem.'

RLS

ER159: On which of the following issues have you or your health and safety representative colleagues received training?’

01) Fire safety; 02) Prevention of accidents; 03) Chemical, biological, radiation or dust hazards; 04) Ergonomics; 05) Violence, bullying or harassment; 06) Work-related stress; 07) Discrimination (for example due to age, gender, race or disability)

The RLS had to ask for clarification on the meaning of ‘ergonomics’.

OSH and organisational performance questions

These questions on organisational performance should have a ‘don’t know’ response option as external consultants are unable to answer them on behalf of establishments. The safety management representative here did not know the answers and also thought that questions on financial situations and comparisons were irrelevant to a public-sector organisation.

5.6 Summary of respondents’ answers

5.6.1 Approach to management of health and safety

MM155/ER200: Is there a documented policy, established management system or action plan on health and safety in your establishment?’

Both safety manager and RLS said yes, although after a few prompts it was clear that they were referring to documents on health and safety rather than to a structured policy. The two interviewees had differing views on the suitability of the health and safety system in place. The safety manager stressed that the system adheres to legislative requirements, which he thought made it sufficient, whilst the RLS complained about the procedures being at a minimum level.

‘We have a policy in the sense that we have documents, we did meetings and there are procedures on paper. Although many things have not been followed up, like for example the training courses to update, everything is done at the limit of the legislation, the minimum required to be on the safe side from controls but that’s it.’

RLS

MM156/ER202: In practice, how much of an impact does this policy, management system or action plan have on health and safety in your establishment? Does it have a large impact, some impact, or practically no impact?’

The interviewees both found this question straightforward but provided different answers; the safety manager said that the policy had ‘some impact’ while the RLS

said it had ‘no impact at all’. The latter believed that managers in the organisation had little interest in health and safety. Whilst the organisation has documents on health and safety procedures, nothing has been done to really develop knowledge and awareness of safety behaviour amongst employees.

‘We all did a training course on health and safety, about basic behaviours and rules... [but] we would need some update, information just to remind people what to do and not to, otherwise you just forget and do not pay attention anymore. We would need to talk about health and safety from time to time, just to discuss and make people aware of possible risks, issues or topics in general. We do not have moments dedicated to health and safety as employees; in this way it is very easy to forget basic safety rules in everyday life.’

RLS

It is unlikely that an external consultant is really able to assess the impact of his work on an establishment.

MM159/ER 214: Overall, how would you rate the degree of involvement of the line managers and supervisors in the management of health and safety? Is it very high, quite high, quite low or very low?

The interviewees found this question straightforward but both provided different answers. The RLS perceived the degree of involvement of managers as very low and stated that they do the bare minimum to comply with the law. The safety manager thought involvement varied, being quite high for one manager, quite low for the account manager and very low for the president of the foundation (who is the ‘owner’ from a legislative point of view).

‘I think about how interested they are on the topic of health and safety. We did some courses but really the minimum, the basic courses required by law without any update or follow up. None of the managers ever talk about health and safety in any way. As RLS I’m the only one that has done something on health and safety.’

RLS

ER215_05: Please tell me whether you agree (1), neither agree nor disagree (2), or disagree (3) with the following statement: ‘Our management gives proper consideration to occupational safety and health issues raised by employee or their representatives’.

The RLS had no issues with this question but neither agreed nor disagreed. Whilst managers do what is required by law, they appear reluctant to do anything beyond this when addressing employee well-being.

‘Because they do not think about [health and safety] as a priority, the attitude is as if employees were here just to cause problems. So more often than not I feel that we cannot talk about the topic and we just leave it as it is and we try to adapt.’

RLS

5.6.2 Risk Assessment

MM161/ER207: Are workplaces in the establishment regularly checked for safety and health as part of a risk assessment or similar measures?

Both interviewees answered yes to the question, although they had different opinions on what the risk assessment included. The safety manager said that he does checks at least twice per month or more when there are works in progress, whilst the RLS said that checks are done just twice per year (the latter just seemed to be referring to the checks on fire safety, see technical issues).

MM162: Are these risk assessments or workplace checks mostly conducted by your own staff or are they normally contracted to external service providers?

This question was considered straightforward. The risk assessment and checks are all done by external providers. The management representative (an external consultant) does most checks but brings in specialist consultants to test the air conditioning or fire alarm.

MM163: On which occasions are these risk assessments or workplace checks carried out?

01) Following a change in the staffing, layout or organisation of work; 02) At the request of employees eg in case of complaints; 03) At regular intervals, without any specific cause.

The safety manager found this straightforward and answered yes to all items. For 01) he replied that checks would be carried out every time there was a change that could potentially affect the safety of the workers; for 02) he provide an example of an employee that made a complaint directly to him about the lighting of a lamp and they changed the lamp; for 03) he just said that they do it regularly.

MM164: Which of the following areas are routinely considered in these checks?' 01) Equipment and working environment; 02) The way work is organised; 03) Irregular or long working hours; 04) Supervisor-employee relationships

The safety said yes to everything. He understood work environment as the physical working space and implants, such as electricity and air conditioning. The organisation of work for him related to the tasks that employees have to perform. Whilst he said that 03) is considered, he also said that staff don't do long or irregular hours. He didn't explain what was done for 04).

MM166: And which of the following actions have been taken as a follow-up to these checks?’

01) Changes to equipment or working environment; 02) Changes to the way work is organised; 03) Changes to working time arrangements; 04) Provision of training.

01) The organisation had made changes to equipment, for example the IT equipment, but not the working environment as it had been recently been renovated.

02) Yes, however the example given was not the result of a risk assessment. He told how the general manager had decided to remove the account manager's involvement in decisions about health and safety as he seemed intent on blocking some changes being made.

03) Yes, the safety manager gave the example of a pregnant woman who had started working part-time

04) Yes, but the safety manager didn't provide any explanation, after probing he just said 'yes we do training'. Again it looks like this may not have resulted from risks assessment.

ER209: Do you have a say in the decisions on when and where these risk assessments or workplace checks are carried out?

The RLS found this question straightforward and answered yes, if they identify problems. In case problems are highlighted by the RLS this lead always to workplace checks but not to a risk assessment. However, they lack technical knowledge that allows them to really see whether something is an issue.

'The problem is that only few of us actually have the knowledge to understand whether there are potential hazards, because we did the courses. Also the majority of people don't walk around the building they do house-desk-house, so they don't know the building and it is difficult for them to see and find possible issues.'

RLS

ER210: If the risk assessment or workplace check identifies a need for action: Is the necessary follow-up action taken?

There were no issues with this question and the RLS answered yes, although he added that some issues take a while to be resolved.

'Yes, we never had problems in this sense. Obviously, it depends on the priority and the urgency of the issues, some problems need more time to be resolved.'

RLS

ER211: And are you as health and safety representatives usually involved in the choice of follow-up actions?

There were no issues with this question. The RLS answered yes, but this is only because he makes sure he is included rather than because he is automatically included.

5.6.3 Levels of concern with occupational safety and health risks

MM200/ER250: For each of the following issues, please tell me whether it is of major concern, some concern, or no concern at all in your establishment? 01) Dangerous substances (eg dusts, chemical, biological); 02) Accidents; 03) Noise and vibration; 04) Musculoskeletal disorders; 05) Work-related stress; 06) Violence or threat of violence; 07) Bullying or harassment

01) Dangerous substances were seen as 'not applicable' by the management rep and 'no concern at all' by the RLS because they are not used in the workplace.

02) The RLS said accidents were no concern, whilst the safety manager thought these were a major concern (see technical section for issues concerning interpretation of 'concern').

03) Noise and vibration were not considered a concern by either respondent as levels are low (as identified by the risk assessment).

04) Musculoskeletal disorders were of no concern to the safety manager and some concern to the RLS. Both told how checks had not revealed any MSD problems amongst the workforce.

05) Work-related stress was not considered a concern by the safety manager because the risk assessment showed levels were below the legal limit. In contrast, the RLS thought these were some concern, particularly for those at the front desk services.

06) 07) Neither violence nor bullying/harassment were considered a concern by either interviewee.

5.6.4 Drivers of and barriers to management of health and safety

MM171: In your establishment, how important are the following reasons for addressing health and safety? For each one, please tell me whether it is a major reason, a minor reason, or no reason at all. 01) Fulfilment of legal obligation; 02) Requests from employees or their representatives; 03) Staff retention and absence management; 04) Economic or performance-related reasons; 05) Requirements from clients or concern about the organisation's reputation; 06) Pressure from the labour inspector

01) 02) Fulfilment of legal obligations and requests from employees are both a major reason.

03) He said 'I don't know' to staff retention and absence management.

05) He thought reputation and requests from clients were not applicable as they do not have direct clients. The organisation provides technical support to the university and does not have direct contacts with students.

'I don't think this is applicable in this case as we do not have direct clients'

Safety Manager

06) Pressure from the labour inspector was a minor reason.

'This is of a little importance, in the sense that we had a check once but nothing major came out of it.'

Safety Manager

MM172: In your establishment, what are the main difficulties in dealing with health and safety? Please tell me for each of the following whether it is a major difficulty, a minor difficulty, or not a difficulty at all.'

01) A lack of resources such as time, staff or money; 02) A lack of awareness; 03) A lack of expertise; 04) A lack of technical support or guidance; 05) The culture within the establishment; 06) The sensitivity of the issue

There were no issues with this question although the interviewee did not want to elaborate on his answers.

01) Major, *'The highest level.'*

02) Minor.

03) Minor.

04) Minor, *'Now is minor, because this has improved a lot in the last few years and is still improving.'*

05) Minor.

06) No at all as considered irrelevant.

5.6.5 Worker participation and involvement

ER102: Is there a permanent committee or working group consisting of members of the management and representatives of the employees dealing with safety and health in this establishment?’

The RLS said no.

ER205: Are employees in this establishment regularly informed about safety and health in the workplace?’

There were no issues with this question and the RLS said no.

‘Regularly no, in the sense that regularly for me is in a systematic way rather than only when something happens. Would be enough just to have informal talks from time to time. There is not an information system to communicate with employees.’

RLS

ER150: Do you as the employee representative for safety and health usually get sufficient time off from normal duties to perform these tasks adequately?’

There were no issues with this question and the RLS said yes.

ER107: How often do controversies related to safety and health arise between the management and the employee representatives? Is this often, sometimes, or practically never the case?’

This question presented no issues and the RLS answered that controversies practically never occur.

‘Controversies for me are problems, how can I say? From a point of a view of an employee that feels that his rights are not respected. For example, I think from having a chair that is more comfortable to have equipment or workplaces adequate to the tasks. Unresolved issues for which employers and employees do not find a common solution or agreement. This is not our case.’

RLS

ER154: Does the management provide you with the necessary information for carrying out your health and safety tasks properly?’

The RLS answered yes but did not appear to really understand the question (see technical issues section).

ER155: Do you usually receive information on time and without having to ask for it?

Yes, the RLS said he receives information on health and safety legislation from the safety manager and the training agency.

ER159: On which of the following issues have you or your health and safety representative colleagues received training?

01) Fire safety; 02) Prevention of accidents; 03) Chemical, biological, radiation or dust hazards; 04) Ergonomics; 05) Violence, bullying or harassment; 06) Work-related stress; 07) Discrimination (for example due to age, gender, race or disability).

The RLS had received training on all items identified except for ergonomics.

ER160: Is this training sufficient or would more training in any of these fields be desirable?

The RLS found this question straightforward. He said he would like to receive more specific training as what he had received so far was general and not tailored to his industry.

5.6.6 OSH and organisational performance

MM402: How would you rate the level of absenteeism in your establishment compared with other establishments in the sector? Is it very high, quite high, about average, quite low or very low?

The safety manager didn't know the answer as he didn't have the data.

'I don't know I cannot answer this question because I don't have the data'

Safety Manager

New question: Compared to other organisations of your size and sector in Italy, how well would you say you perform in terms of health and safety outcomes such as the number of accidents and injuries at work, and the level of sickness absence?'

According to the safety manager the organisation hadn't had any accidents since he had started.

MM403: How would you rate the current economic situation of this establishment? Is it very good, quite good, neither good nor bad, quite bad or very bad?

The safety manager didn't know the answer to this question.

'I don't know. Keep in mind that this organisation depends on public funds. I think this question doesn't apply to this organisation.'

Safety Manager

New question: Compared to other organisations of your size and sector in Italy, how well would you say you perform in terms of business outcomes such as profit, turnover or other relevant measures of performance?

As for MM403, the safety manager didn't know the answer to this question and thought it wasn't applicable to a public-sector organisation.

6 Establishment Overview ID 62809

6.1 Establishment background

The organisation is a large private company in the food industry. It provides catering services across the whole national territory and employs around 5,400 staff. The activities of the establishment include food distribution, installation of vending machines, and cleaning of offices, hospitals and schools. There are two sites with administrative employees, the headquarters in the North of Italy and another administrative office in the South. The interviews were carried out at the headquarters.

The majority of workers are permanent and most work part-time (the company provides catering services at lunch time and office cleaning at night). The company has a high turnover of staff, around 1 million workers per year (although the manager says that this about average for the sector).

6.2 Respondent profiles

The management representative is in charge of health and safety for the whole company and is the RSPP (*Responsabile del Servizio di Prevenzione e Protezione*, Responsible of the Prevention and Protection Service) for one division. He started in the company six years ago and has been RSPP since 2009.

The employee representative is the RLS (*Rappresentante dei Lavoratori per la Sicurezza*, Workers' representative on health and safety) at the headquarters, having been elected by his colleagues. He has been with the company since March 2004 and is responsible for maintenance in the kitchens at all sites across the Italian territory. He also coordinates all services that relate to maintenance (eg buying equipment, purchase of external services etc). In 2009 he completed the statutory training courses for RLS and has done updates since then.

The interview with the safety manager related to the health and safety system for the whole company. The interview with the RLS focussed on health and safety at the headquarters only.

6.3 Organisation of health and safety

Each division has an 'owner' (*datore di lavoro*) who is legally responsible for health and safety in their area. There are two RSPPs that cover all divisions; managers then have operational health and safety responsibilities for around ten sites each, and finally each site has a supervisor (usually the chef) responsible for health and safety. They use an external occupational health service.

6.4 Health and safety performance

According to the proforma there are 90 managers and senior officials with defined health and safety role/responsibilities (five 'owners', 85 managers) plus 400 employees with supervisory responsibilities ('preposti'). Table 2 of the proforma (on hours spent) was only completed for three individuals: four hours for employee 1, eight hours for employee 2, 16 hours for employee 3.

In 2011 the company spent €2,400 on an external health and safety consultancy, €2,000 on working at height training and €7,000 on a work-related stress risk assessment. Costs for purchased equipment included €1,700 on heat-resistant gloves (PPE) and €75,000 on fire alarm systems.

The number of working days lost due to work-related accidents in 2011 was zero for managers and was incomplete for employees. The number of accidents over the period was 245 for 5,400 employees. The data provided were incomplete and unclear, as although there had been accidents in 2011 the number of days lost was nil for managers and no estimation was provided for employees.

6.5 Main technical issues

(issues with interpretation of questions, concepts and words; sensitivity of questions; problems in recall or reaching a judgment in answering)

MM162: Are these risk assessments or workplace checks mostly conducted by your own staff or are they normally contracted to external service providers?

It was felt that this question was too simplistic to describe the variety of cases, and could be improved with additional response options. The safety manager also explained that there is a significant difference between the risk assessment which they carry out for legal purposes and the other workplace checks that are carried out.

MM163: On which occasions are these risk assessments or workplace checks carried out? 01) Following a change in the staffing, layout or organisation of work; 02) At the request of employees eg in case of complaints; 03) At regular intervals, without any specific cause.

The meaning of the third item was not clear. The phrase 'without any specific cause' seemed to confuse the safety manager, even those the establishment does carry out these kind of checks.

'Without specific causes no, regularly according to the legislation, if I have to do risk assessment every four years we do it, but not without specific reasons.'

Safety Manager

MM164: Which of the following areas are routinely considered in these checks? 01) Equipment and working environment; 02) The way work is organised; 03) Irregular or long working hours; 04) Supervisor-employee relationships.

The safety manager interpreted 'the way work is organised' as referring to hours worked rather than the distribution of tasks.

'If by the way work is organised you mean shifts and working hours the answer is not, as by nature of the business we have very strict working hours, we serve lunch and do offices cleaning so there is nothing we can do to change this.'

Safety Manager

MM166: And which of the following actions have been taken as a follow-up to these checks?'

01) Changes to equipment or working environment; 02) Changes to the way work is organised; 03) Changes to working time arrangements; 04) Provision of training

The safety manager answered yes to all items but then explained that (2) and (3) came about not because of a risk assessment but following advice they received from an occupational health doctor.

ER209: Do you have a say in the decisions on when and where these risk assessments or workplace checks are carried out?'

The RLS answered yes to this question, but was unclear whether this was because of his employee rep role or his maintenance role.

'It's difficult for me to give a clean cut answer here, because I'm involved anyway as my responsibility is about the maintenance of equipment and machines, so I don't know case by case if I'm involved as RLS as well or because of my role.'

RLS

MM200/ER250: For each of the following issues, please tell me whether it is of major concern, some concern, or no concern at all in your establishment?'

01) Dangerous substances (eg dusts, chemical, biological); 02) Accidents; 03) Noise and vibration; 04) Musculoskeletal disorders; 05) Work-related stress; 06) Violence or threat of violence; 07) Bullying or harassment

Both the safety manager and RLS were confused by this question and immediately asked what was meant by 'concern'. Interpretations were slightly different, as illustrated in the quotations below.

'We do a risk assessment for dangerous substances, but we don't really use particular substances apart from cleaning products. I'm not sure what you mean here by being or not being 'concerned'. There is concern but is not a high concern, not in the sense that we do not care, but in the sense that we do not have particularly dangerous substances and we do keep the risks under control.'

Safety Manager

'You mean the concern that I have as RLS or concern from the company? I would say I understand this question as being about concern from me as a RLS. In our site I would say no concern, in the sense that we do not use dangerous substances so I'm not concerned about these possible risks.'

RLS

Some of the discrepancy in the answers also came about because the safety manager focused on the company as a whole whilst the RLS focussed on the headquarters only.

MM172: In your establishment, what are the main difficulties in dealing with health and safety? Please tell me for each of the following whether it is a major difficulty, a minor difficulty, or not a difficulty at all.'

01) A lack of resources such as time, staff or money; 02) A lack of awareness; 03) A lack of expertise; 04) A lack of technical support or guidance; 05) The culture within the establishment; 06) The sensitivity of the issue

The safety manager could not see a clear distinction between (2) and (5), or between (3) and (4). It was also unclear who the questions about lack of expertise and technical support or guidance refer to.

'Do you mean awareness amongst the health and safety personnel or workers in general?'

Safety Manager

ER102: Is there a permanent committee or working group consisting of members of the management and representatives of the employees dealing with safety and health in this establishment?

The RLS was slightly confused by this question and what was meant by a permanent committee.

'Well, what do you mean for permanent committee?... I think of people that meet up regularly to talk about health and safety issues. The word 'committee' doesn't sound right to me. (The answer is) yes in the sense that there are people within the company who are in charge of health and safety, those that are part of the service of prevention and protection and they meet at the formal annual meeting (riunione periodica) as required by law. But if you mean a restricted group of people, such as the RSPP and RLS, this is a no then. Considering that this site is only administrative you don't have many risks, so to meet up once per year is enough.'

RLS

ER205 : Are employees in this establishment regularly informed about safety and health in the workplace?'

The interviewee didn't understand this question and thought some examples would help to clarify it.

'What do you mean by 'regularly informed'? For me, regularly informed means that they receive information periodically, let's say once per year rather than when something happens.'

RLS

ER154: Does the management provide you with the necessary information for carrying out your health and safety tasks properly?

The RLS answered yes, although he was unsure what was sort of information this was meant to include. He said that he received a lot of training to help him in his role.

MM402: How would you rate the level of absenteeism in your establishment compared with other establishments in the sector? Is it very high, quite high, about average, quite low or very low?

New question: Compared to other organisations of your size and sector in Italy, how well would you say you perform in terms of health and safety outcomes such as the number of accidents and injuries at work, and the level of sickness absence?’

The safety manager found these questions difficult to answer as he didn’t know how they performed in terms of absence.

MM403: How would you rate the current economic situation of this establishment? Is it very good, quite good, neither good nor bad, quite bad or very bad?

New question: Compared to other organisations of your size and sector in Italy, how well would you say you perform in terms of business outcomes such as profit, turnover or other relevant measures of performance?

The safety manager found these questions difficult to answer as he did not have any data on the economic or financial performance of the company.

6.6 Summary of respondents’ answers

6.6.1 Approach to management of health and safety

MM155/ER200: Is there a documented policy, established management system or action plan on health and safety in your establishment?’

This question was considered straightforward by both interviewees. Yes, the organisation has a written policy specifically on health and safety which is displayed on the staff notice board. The company also holds a number of ISO certificates including 9001 and 10854 for quality and management and 14001 for environmental management. The safety manager explained that they are driven to manage health and safety partly by client requirements.

‘There are some big clients that are part of projects with ‘zero accidents’ policies which apply to them and their external contractors, and on these cases there is maximum attention on health and safety policies and certifications.’

Safety Manager

MM156/ER202: In practice, how much of an impact does this policy, management system or action plan have on health and safety in your establishment? Does it have a large impact, some impact, or practically no impact?’

This question presented no issues. The safety manager answered that it has a large impact (considering the organisation as a whole) whilst the RLS said it had some impact (considering the headquarters site only).

The safety manager explained that the impact was mixed across the different sites they are contracted to work in. For example, some of their work is conducted in a power station, where health and safety is strongly emphasised. This has a positive impact on the attitudes and behaviours of their own staff. In contrast health and safety procedures in public schools are not of a high standard which has a negative effect on staff attitudes and behaviour. Another challenge they face is that some staff in the catering sector are ‘inherited’ from other companies when a new contract is won, and therefore come with their own attitudes and ways of working. Whilst the company inducts these individuals in its own health and safety training, it can be harder to get these individuals on board. The safety manager also mentioned that the ageing workforce interferes with the impact of the policy; his experience is that older employees resist changes and do not always adhere to new health and safety rules and criteria. In general it is much easier to train young and newly employed people from the beginning rather than to retrain the older workforce.

MM159/ER 214: Overall, how would you rate the degree of involvement of the line managers and supervisors in the management of health and safety? Is it very high, quite high, quite low or very low?’

There were no issues with this question. The safety manager and RLS both agreed that the degree of involvement was ‘quite high’. They both recognised that managers at all levels took health and safety seriously and showed commitment to maintaining high standards. However, the safety manager recognised that the company no longer ‘runs the extra mile’ on health and safety like it used to. Due to the financial crisis they now have to be more careful about what they spend on health and safety.

‘I say quite high and not very high, because health and safety activities are costs that do not bring direct profits, there is an economic return but not profits, so for many managers this is just something that you have to do. Mostly with this economic crisis, there is attention to health and safety issues but we are more careful with the money, for example the certifications are not for all business areas, but just for some, according to clients’ requests. There are different factors that drive commitment and costs on health and safety, with this crisis you cannot run the extra mile, so for example is enough to respect legislative requirements rather than going for certifications.’

Safety Manager

ER215_05: Please tell me whether you agree (1), neither agree nor disagree (2), or disagree (3) with the following statement: 'Our management gives proper consideration to occupational safety and health issues raised by employee or their representatives'.

There were no issues with this question. The RLS agreed with the statement and understood 'proper consideration' to mean 'response' proportional to the problem.

6.6.2 Risk Assessment

MM161/ER207: Are workplaces in the establishment regularly checked for safety and health as part of a risk assessment or similar measures?

There were no issues with this question. Yes, the sites are regularly checked by the managers and RSPPs. Formal checks are carried out in preparation for the legal risk assessment, while informal checks relate to internal procedures. In addition the RSPPs try to visit all sites at least twice per year. Both the safety manager and RLS agreed that 'regularly' is something that is carried out systematically according to an agreed schedule.

MM162: Are these risk assessments or workplace checks mostly conducted by your own staff or are they normally contracted to external service providers?

The checks are conducted by their own staff and external providers. The company uses external providers for more technical checks and to validate the risk assessment documents.

MM163: On which occasions are these risk assessments or workplace checks carried out?

01) Following a change in the staffing, layout or organisation of work; 02) At the request of employees eg in case of complaints; 03) At regular intervals, without any specific cause.

For item (1) risk assessments and checks are carried out when there is a change in the organisation of work but not when there are changes to staffing and layout. They are also carried out (2) when there are complaints or requests from employees but not (3) at regular intervals without specific cause (please see the technical section for concerns about item (3)).

MM164: Which of the following areas are routinely considered in these checks?

01) Equipment and working environment; 02) The way work is organised; 03) Irregular or long working hours; 04) Supervisor-employee relationships.

There were no issues with this question.

- 01) Equipment and working environment, yes they are routinely checked.
- 02) The way work is organised, no because the organisation of work is quite fixed (please see technical section for more on the way this was interpreted).
- 03) Irregular or long working hours are regularly assessed as night shifts need to be considered in the legal risk assessment document.
- 04) Supervisor-employee relationships are not part of the risk assessment, but the company looks into this through other means (as part of their internal policy on social responsibility).

MM166: And which of the following actions have been taken as a follow-up to these checks?’

01) Changes to equipment or working environment; 02) Changes to the way work is organised; 03) Changes to working time arrangements; 04) Provision of training

The safety manager answered yes to all items. However, he explained that changes to the way work is organised came about not because of the risk assessment, but after a visit from an occupational health doctor. In this case the doctor reckoned that an employee was no longer fit to lift heavy weights so they changed his task. The same was true for item (3), changes to working time arrangements came about not because of the risk assessment but following advice from an occupational health doctor.

ER209: Do you have a say in the decisions on when and where these risk assessments or workplace checks are carried out?’

Yes, although the RLS’ day job involves organising maintenance so he would expect to be involved anyway.

ER210: If the risk assessment or workplace check identifies a need for action: Is the necessary follow-up action taken?’

The RLS found this question straightforward. He said that yes, usually there are no problems.

ER211: And are you as health and safety representatives usually involved in the choice of follow-up actions?’

The RLS found this question straightforward. No, the representatives are not usually involved in the choice of follow-up actions.

‘They tell us what they are doing, they let us know, but if you mean do they ask our opinion as RLS about what to do, then no.’

RLS

6.6.3 Levels of concern with occupational safety and health risks

MM200/ER250: For each of the following issues, please tell me whether it is of major concern, some concern, or no concern at all in your establishment?’

01) Dangerous substances (eg dusts, chemical, biological); 02) Accidents; 03) Noise and vibration; 04) Musculoskeletal disorders; 05) Work-related stress; 06) Violence or threat of violence; 07) Bullying or harassment

01) Dangerous substances were some concern for the safety rep but no concern at all for the RLS. This area of risk is part of the formal risk assessment, so they know the risks are not high.

02) Accidents were a major concern for the safety manager for two reasons: some clients have a ‘zero accident’ policy, so they need to ensure they keep to this and they have a problem with absenteeism due to work-related accidents whereby employees with minor injuries take far longer than is required.

‘Major concern, because there is the problem of ratings from our client and another problem is the time off from minor injuries, more often than not it happens that someone has a cut and the doctor gives them two or three days off, and afterwards this becomes five days and then two weeks, which is not really realistic. Whether it is a serious injury from day one or it is not, a cut should get better not worst. In many cases it is difficult to understand what is really going on. We never had accidents more than minor cuts or back pain for moving stuff, but nothing serious. There is concern because it is difficult to control what really is about when they claim an injury and the time off doesn’t seem proportional to the injury.’

Safety Manager

In contrast accidents were not considered a concern by the RLS (possibly because he only focused on the headquarters where administrative tasks are carried out).

‘None because this is the administrative headquarters so there are no big risks and it is almost impossible to have an accident here. The only likely accidents are those that can happen during commuting time.’

RLS

03) Noise and vibration were not considered a concern by either the safety manager or the RLS as the risks are not present in the organisation.

04) Musculoskeletal disorders were a major concern for the safety manager and some concern for the RLS. The safety manager explained that MSDs are a high risk in the catering sector and are the main reason for staff absence. He also felt that these problems were aggravated by an ageing workforce.

‘Yes, in this case there is high concern, these are the most common injuries and they are the first reason for absenteeism. We have an ageing workforce and repetitive movements or heavy stuff easily cause injuries.’

Safety Manager

On the other hand the RLS, referring only to the office work in the headquarters, was concerned about the long hours spent by staff in front of the computer.

05) Work-related stress was considered no concern by the safety manager. In a recent risk assessment, levels of stress were found to be below the legal threshold. The RLS considered this some concern, mostly when there are tight work deadlines.

06) Violence and 07) bullying and harassment were considered no concern by either the safety manager or RLS. The company has procedures in place to keep these low.

6.6.4 Drivers of and barriers to management of health and safety

MM171: In your establishment, how important are the following reasons for addressing health and safety? For each one, please tell me whether it is a major reason, a minor reason, or no reason at all.'

01) Fulfilment of legal obligation; 02) Requests from employees or their representatives; 03) Staff retention and absence management; 04) Economic or performance-related reasons; 05) Requirements from clients or concern about the organisation's reputation; 06) Pressure from the labour inspector.

There were no issues with this question.

01) Fulfilment of legal obligation and 02) requests from employees were both major reasons.

03) Staff retention and absence management were a minor reason as the catering sector has, by nature, a high turnover of staff.

04) Economic or performance-related reasons and 05) requirement from clients were both major reasons. A number of clients ask for strict health and safety procedures and have internal 'zero accidents' policies, therefore having a good system management meant keeping important clients with positive economic returns. They also pay a lot of attention to the organisation's reputation.

06) Pressure from the labour inspectorate is a major reason. The safety manager explained that this is a problem because the company has sites scattered across the national territory and every region/province has different legislation and regulations on health and safety. It is extremely difficult for them to keep on top of all of these so they are concerned about failing future checks from inspectors.

MM172: In your establishment, what are the main difficulties in dealing with health and safety? Please tell me for each of the following whether it is a major difficulty, a minor difficulty, or not a difficulty at all.'

01) A lack of resources such as time, staff or money; 02) A lack of awareness; 03) A lack of expertise; 04) A lack of technical support or guidance; 05) The culture within the establishment; 06) The sensitivity of the issue

01) A lack of resources was not considered a problem for the company as health and safety is seen as a priority.

02) A lack of awareness was considered a major problem; some employees (particularly older ones) do not give proper consideration to health and safety procedures.

'It is a major problem with employees in the sense that some workers do not understand the importance of health and safety rules, mainly if they are of a certain age.'

Safety Manager

03) A lack of expertise and 04) a lack of technical support or guidance were not considered a problem.

05) The culture within the establishment was considered a major problem, for the same reason as for item (2).

06) The sensitivity of the issue was not considered a problem.

6.6.5 Worker participation and involvement

ER102: Is there a permanent committee or working group consisting of members of the management and representatives of the employees dealing with safety and health in this establishment?'

It was not clear whether the company had a working group or permanent committee as the RLS did not understand the question.

ER205 : Are employees in this establishment regularly informed about safety and health in the workplace?'

The RLS didn't clear say yes or no to this, only that some information is put on the notice board (see technical section for more on this).

ER107: How often do controversies related to safety and health arise between the management and the employee representatives? Is this often, sometimes, or practically never the case?’

There were no issues with this question. The RLS said that sometimes there are controversies, largely due to employees that refuse to wear their protective equipment.

‘For issues related to this administrative site no, practically never, but in the operational sites sometimes, yes you may have controversies. For example, when the company gives the PPE to workers some of them refuse to put them on, in these cases you have issues and controversies.’

RLS

ER150: Do you as the employee representative for safety and health usually get sufficient time off from normal duties to perform these tasks adequately?’

The RLS found this straightforward and answered yes.

ER154: Does the management provide you with the necessary information for carrying out your health and safety tasks properly?’

The RLS answered yes to this.

ER155: Do you usually receive information on time and without having to ask for it?’

The RLS answered yes to this.

ER159: On which of the following issues have you or your health and safety representative colleagues received training?’

01) Fire safety; 02) Prevention of accidents; 03) Chemical, biological, radiation or dust hazards; 04) Ergonomics; 05) Violence, bullying or harassment; 06) Work-related stress; 07) Discrimination (for example due to age, gender, race or disability).

There were no issues with this question.

01) Fire safety training: no. However, other staff responsible for emergency evacuations will have received this training.

02) Prevention of accidents: yes.

03) Chemical, biological, radiation or dust hazards: no for the same reasons as in item (1).

04) Ergonomics: yes.

05) Violence, bullying or harassment: no.

06) Work-related stress: no.

07) Discrimination: yes but as part of the training for the social responsibility certification.

ER160: Is this training sufficient or would more training in any of these fields be desirable?

There were no issues with this question. The RLS said that training was sufficient to cover his responsibilities as RLS at the site.

6.6.6 OSH and organisational performance

MM402: How would you rate the level of absenteeism in your establishment compared with other establishments in the sector? Is it very high, quite high, about average, quite low or very low?

The safety manager didn't know the answer to this question as he didn't have any data on absenteeism.

New question: Compared to other organisations of your size and sector in Italy, how well would you say you perform in terms of health and safety outcomes such as the number of accidents and injuries at work, and the level of sickness absence?'

The safety manager thought the company had relatively low numbers of accidents but didn't know how they compared in terms of sickness absence.

MM403: How would you rate the current economic situation of this establishment? Is it very good, quite good, neither good nor bad, quite bad or very bad?

The safety manager thought this was very good, although he based this on his 'gut feeling' rather than any hard data.

New question: Compared to other organisations of your size and sector in Italy, how well would you say you perform in terms of business outcomes such as profit, turnover or other relevant measures of performance?

The safety manager didn't have information to enable him to answer this question.

7 Establishment Overview ID 71910

7.1 Establishment background

The company is a corporation in the broadcasting sector (TV, advertising and cinema) with more than 3,500 employees across 40 sites. The headquarters is the main site with 2,500 employees. It includes administrative buildings and broadcasting studios.

7.2 Respondent profiles

The RSPP (*Responsabile del Servizio di Prevenzione e Protezione*, Responsible for the Prevention and Protection Service) interviewed is responsible for health and safety (H&S) for the whole company. He has been working for the company for more than 20 years, having started as a civil engineer in the technical side of the business before moving into H&S.

The RLS (*Rappresentate dei lavoratori per la sicurezza*, Workers' representative on health and safety) has been working for the company for 30 years. He has held the role of RLS since 1996 and has been a union rep. for 20 years. He has a technical background and is also responsible for the technical side of projects and training employees.

The interview was held at the headquarters. Responses from the RSPP applied to the whole organisation (across all sites) whilst the interview with the RLS focussed only on the administrative building at the headquarters.

7.3 Organisation of health and safety

There is a centralised H&S service responsible for the H&S system of eight of the corporation's companies. Its two other companies are considered high risk so have a separate H&S system. These two companies have their own RSPP, but still liaise with the RSPP at central level.

The centralised H&S service has one RSPP, two managers that support the RSPP (all full time and employed by the company), plus three workers from an external consultancy company who monitor the sites. Within each company there is a

safety manager responsible for H&S in the company plus other people with different responsibilities.

Each site has its own RLS. The company decided to combine the roles of RLS and union rep., as permitted by the legislation. According to the RLS this gives them more negotiation power as many H&S issues are related to other working condition issues.

The RLS pointed out that, although the business is not considered a high risk sector, the technical developments in the media sector mean that the risk profile of new jobs is changing. Unfortunately the legislative framework has not kept pace with this change.

‘Technological developments have led to a completely different way of working and obviously new risks. For example the editing and assembly procedures, before they needed special machines, people with different skills and expertise and involved a variety of job; now everything is done with a computer by one single person... Often there are problems related to the fact the legislative framework is inadequate in the sense that doesn’t keep up to new health risks linked to the use of new technologies. For example, there are people that have to use the headphones for eight hours every day, what are the implications of this on physical and psychological health?’

RLS

7.4 Health and safety performance

This company did not complete the health and safety proforma.

7.5 Main technical issues

(issues with interpretation of questions, concepts and words; sensitivity of questions; problems in recall or reaching a judgment in answering)

MM200/ER250: For each of the following issues, please tell me whether it is of major concern, some concern, or no concern at all in your establishment?

01) Dangerous substances (eg dusts, chemical, biological); 02) Accidents; 03) Noise and vibration; 04) Musculoskeletal disorders; 05) Work-related stress; 06) Violence or threat of violence; 07) Bullying or harassment.

In answering this question both the safety manager and RLS used the term ‘concern’ inconsistently, referring sometimes to the presence or absence of risk, sometimes to the presence of symptoms amongst staff and sometimes to the ability to detect risk. For example, the safety manager stated that he was not concerned about dangerous substances or noise because the company consisted mainly of office-based work, so they did not use dangerous substances or carry out noisy activities. He was also not concerned about MSDs because, although

much of the work was desk-based, the occupational health doctor had not identified any MSD problems amongst staff. Work-related stress was of some concern for the safety manager, again because no employees had complained about stress. However, the RLS considered this a major concern due to the fact that it was difficult to measure objectively.

'As for stress, this is a new risk that has been brought to attention only recently. In addition, companies have not received any clear guidelines on how to measure this risk. While other risks and conditions can be objectively measured, measuring stress is really complicated.'

RLS

However, when asked specifically about the meaning of 'concern', the RLS' answer suggested another interpretation again. He explained that high or low levels of concern depend on the consideration given to the issue by the company.

'Concern for me relates to the level of attention that the company has with regard to one problem, meaning that the problem is not overlooked or disregarded. Therefore the company is preoccupied in the sense that they take care of it.'

RLS

MM162: Are these risk assessments or workplace checks mostly conducted by your own staff or are they normally contracted to external service providers?'

The safety manager pointed out that it was difficult to answer this question as they carry out different levels of workplace checks that are not related to the legal risk assessment requirement, but to their internal H&S policies. Workplaces are constantly monitored by two dedicated workers contracted from an external company. Daily checks are also performed by the safety managers responsible of each site and the RSPP. In addition, routine checks or assessments that require specific expertise are carried out by external experts. These workplace checks usually relate to H&S internal procedures which go beyond the statutory risk assessment.

MM163: On which occasions are these risk assessments or workplace checks carried out?'

01) Following a change in the staffing, layout or organisation of work; 02) At the request of employees eg in case of complaints; 03) At regular intervals, without any specific cause.

The safety manager found (3) unclear. They do not perform checks at regular intervals without any specific cause, but do have a regular monitoring system in place. Clearly the term 'without specific cause' caused confusion.

'No, in the sense that we don't do them randomly, every year we do the monitoring that we need to do regularly but that's it. Not sure if the fact that we have an internal monitoring system and daily checks activity to keep our risk assessment updated relates to this question.'

RSPP

As above, the interviewee also pointed out that there is a clear difference between 'risk assessment', which is the statutory risk assessment document, and 'workplace checks' which relate to their internal policies but also serve the function of keeping the risk assessment document updated.

MM159/ER 214: Overall, how would you rate the degree of involvement of the line managers and supervisors in the management of health and safety? Is it very high, quite high, quite low or very low?'

In this question the RLS referred to the senior management rather than line managers and supervisors. Additionally, the RLS thought the degree of involvement varied according to the issue. The senior management was highly involved in 'big issues' requiring a certain amount of resource (eg the renovation of the air-conditioning and the lighting implants) but not minor problems or daily H&S activities.

MM166: And which of the following actions have been taken as a follow-up to these checks? 01) Changes to equipment or working environment; 02) Changes to the way work is organised; 03) Changes to working time arrangements; 04) Provision of training

The interviewee said yes to item 04) provision of training (although the safety manager explained that basic H&S training was provided to all workers, in addition to specific health and safety courses relating to different jobs and not as a result of risk assessment or workplace checks.

New question: Compared to other organisations of your size and sector in Italy, how well would you say you perform in terms of health and safety outcomes such as the number of accidents and injuries at work, and the level of sickness absence?'

MM403: How would you rate the current economic situation of this establishment? Is it very good, quite good, neither good nor bad, quite bad or very bad?'

ER150: Do you as the employee representative for safety and health usually get sufficient time off from normal duties to perform these tasks adequately?'

Answers to this question may vary according to health and safety representatives. In this case the RLS said he has sufficient time to carry out his H&S-related tasks. However, he specified that because of his position as a middle manager, he has some flexibility on how to use his working time. He was aware of other RLSs that had some complaints about not having sufficient time.

New question: Compared to other organisations of your size and sector in Italy, how well would you say you perform in terms of business outcomes such as profit, turnover or other relevant measures of performance?

The safety manager did not know the answer to any of these three questions (see summary section for more detail on why). It may be necessary to add an 'I do not know' response option to this question.

7.6 Summary of respondents' answers

7.6.1 Approach to management of health and safety

MM155/ER200: Is there a documented policy, established management system or action plan on health and safety in your establishment?'

There were no issues with this question. The safety manager said yes. The group is certified to ISO 18001 and their H&S policy has been designed according to this certification. It covers the whole corporation so there are operational and managerial procedures that apply to all sites and companies of the group.

MM156/ER202: In practice, how much of an impact does this policy, management system or action plan have on health and safety in your establishment? Does it have a large impact, some impact, or practically no impact?'

Both the safety manager and RLS agreed that the policy has a large impact. The safety manager referred to impact at two levels; the consistent application of guidelines across all companies and sites and the operation of H&S. In line with this, the RLS described the impact as the standardisation of procedures and guidelines across all sites and employees.

MM159/ER 214: Overall, how would you rate the degree of involvement of the line managers and supervisors in the management of health and safety? Is it very high, quite high, quite low or very low?'

There were no issues with this question. The safety manager said there that involvement was very high for all managers across the hierarchy. The RLS thought that senior management was highly involved in 'big issues' requiring a certain amount of resource (eg the renovation of the air-conditioning and the lighting implants) but not minor problems or daily H&S activities.

ER215 05: Please tell me whether you agree (1), neither agree nor disagree (2), or disagree (3) with the following statement: ‘Our management gives proper consideration to occupational safety and health issues raised by employee or their representatives’.

There were no issues with this question. The RLS agreed with the statement and gave the example of improvements made to the air-conditioning and lighting system following complaints from employees.

7.6.2 Risk Assessment

MM161/ER207: Are workplaces in the establishment regularly checked for safety and health as part of a risk assessment or similar measures?’

There were no issues with this question. Both the safety manager and the RLS answered that the sites are monitored constantly and that checks are performed regularly by dedicated workers on fire doors, fire extinguishers, steps and other equipment. Both the safety manager and RLS interpreted ‘regularly’ as meaning daily monitoring of the workplace environment. Additionally, both explained that employees are strongly advised and encouraged to highlight possible health hazards.

MM162: Are these risk assessments or workplace checks mostly conducted by your own staff or are they normally contracted to external service providers?

The daily monitoring and checks are conducted by two external workers contracted specifically for this job. However, the safety managers at each site are also required to do regular checks on the workplaces. More technical controls and checks are done by external experts.

MM163: On which occasions are these risk assessments or workplace checks carried out?’

01) Following a change in the staffing, layout or organisation of work; 02) At the request of employees eg in case of complaints; 03) At regular intervals, without any specific cause.

Workplace checks are carried out following 01) changes in staff, layout and work organisation, and 02) at request of employees, but not (3) at regular intervals without specific cause (see the technical section for more on how this latter item was interpreted).

MM164: Which of the following areas are routinely considered in these checks?’

01) Equipment and working environment; 02) The way work is organised; 03) Irregular or long working hours; 04) Supervisor-employee relationships.

This question did not present any issues. The safety manager said that all of these areas are routinely considered in the checks, except for the (4) supervisor-employee relationships. The safety manager explained that this is not part of the H&S policy but covered by the HR policies and procedures. He would only be required to take action if the issues couldn't be dealt with by HR and escalated to the involvement of the occupational health doctor.

MM166: And which of the following actions have been taken as a follow-up to these checks?01) Changes to equipment or working environment; 02) Changes to the way work is organised; 03) Changes to working time arrangements; 04) Provision of training

Actions had been taken following H&S checks in the case of (1) changes to equipment or work environment (for example the whole air-conditioning system had been changed); and (4) provision of training (although the safety manager explained that basic H&S training was provided to all workers, in addition to specific health and safety courses relating to different jobs).

The Safety manager said that no actions had been taken to change the work organisation, as there was little flexibility due to the type of work done (eg, broadcasting time, etc...); also not changes had never been made to working time arrangements as there was never the need.

ER209: Do you have a say in the decisions on when and where these risk assessments or workplace checks are carried out?’

There were no issues with this question. The RLS said that he had a say on when and where work place checks were carried and he was always involved when risk assessment took place. Additionally, there was a greater degree of involvement in workplace checks rather than risk assessment, in the sense that complains from the RLS would always lead to workplace checks, then depending on results from workplace checks this might or might not lead to a risk assessment procedure to be open.

ER210: If the risk assessment or workplace check identifies a need for action: Is the necessary follow-up action taken?’

There were no issues with this question and the RLS answered yes.

ER211: And are you as health and safety representatives usually involved in the choice of follow-up actions?’

There were no issues with this question. The RLS said yes and explained that there is also an (informal) internal procedure to involve HR managers and general service managers when there is an H&S issue to be discussed.

7.6.3 Levels of concern with occupational safety and health risks

MM200/ER250: For each of the following issues, please tell me whether it is of major concern, some concern, or no concern at all in your establishment?’

01) Dangerous substances (eg dusts, chemical, biological); 02) Accidents; 03) Noise and vibration; 04) Musculoskeletal disorders; 05) Work-related stress; 06) Violence or threat of violence; 07) Bullying or harassment.

01) Dangerous substances were not a concern for either the safety manager or RLS as the company does not use any.

02) Accidents were not considered a concern by either the safety manager or RLS. The two interviewees agreed that, given the fact that most work is office-based, the company’s risk profile is very low in this regard and both said that there had been no accidents in the last few years.

03) Noise and vibration were not considered a concern by either the safety manager or the RLS as it is not a noisy work environment.

04) MSDs were not a concern for the safety manager as their occupational health doctor had not found any problems in this area amongst staff. However, these were of some concern to the RLS as many people are desk-based.

05) Work-related stress was of some concern to the safety manager. Due to the general economic situation, some employees had shown some stress-related symptoms which were being monitored by the occupational health doctor. The RLS said this was a major concern because work related stress is a new emerging risk, difficult to detect and difficult to measure objectively.

06) and 07) Violence, bullying and harassment were not considered a concern by either the safety manager or the RLS as staff had never complained about this in the past.

7.6.4 Drivers of and barriers to management of health and safety

MM171: In your establishment, how important are the following reasons for addressing health and safety? For each one, please tell me whether it is a major reason, a minor reason, or no reason at all.'

01) Fulfilment of legal obligation; 02) Requests from employees or their representatives; 03) Staff retention and absence management; 04) Economic or performance-related reasons; 05) Requirements from clients or concern about the organisation's reputation; 06) Pressure from the labour inspector.

There were no issues with this question. For the safety manager (1) fulfilment of legal obligation, (5) requirements from clients and (6) pressure from the labour inspectorate were all major reasons for addressing H&S. He explained that legal obligation was the main driver to keeping high H&S standards.

'Let's say that the main priority is to fulfil legal obligations, then we can talk about everything else.'

Safety Manager

(2) Requests from employees and (3) staff retention absence and retention were both minor reasons, whilst (4) economic or performance-related reasons were not reasons for addressing health and safety.

MM172: In your establishment, what are the main difficulties in dealing with health and safety? Please tell me for each of the following whether it is a major difficulty, a minor difficulty, or not a difficulty at all.'

01) A lack of resources such as time, staff or money; 02) A lack of awareness; 03) A lack of expertise; 04) A lack of technical support or guidance; 05) The culture within the establishment; 06) The sensitivity of the issue.

There were no issues with this question. None of the areas were thought to present difficulties in dealing with H&S. The safety manager explained that, due to the high profile of the company, it is a priority to avoid any problem that could lead to negative publicity. Therefore, he was given all instruments, resources and power to do whatever was needed to keep H&S standards high.

7.6.5 Worker participation and involvement

ER102: Is there a permanent committee or working group consisting of members of the management and representatives of the employees dealing with safety and health in this establishment?'

There were no issues with this question. There is not a permanent committee or working group, however the RLSs and RSPPs meet up during the year to prepare for the statutory annual meeting of the SPP (*Servizio di prevenzione e protezione*).

ER205: Are employees in this establishment regularly informed about safety and health in the workplace?’

There were no issues with this question. The RLS believed that all employees were regularly informed. There is a public part of the intranet available to all employees with information on H&S (eg. videos for emergency evacuation procedures).

ER107: How often do controversies related to safety and health arise between the management and the employee representatives? Is this often, sometimes, or practically never the case?’

There were no issues with this question. The RLS said that there had never been any controversies with the management.

ER150: Do you as the employee representative for safety and health usually get sufficient time off from normal duties to perform these tasks adequately?’

There were no issues with this question. The RLS said he has sufficient time to carry out his H&S-related tasks. However, he specified that because of his position as a middle manager, he has some flexibility on how to use his working time. He was aware of other RLSs that had some complaints about not having sufficient time.

ER154: Does the management provide you with the necessary information for carrying out your health and safety tasks properly?’

There were no issues with this question. The RLS answered yes and added that they also receive training.

ER155: Do you usually receive information on time and without having to ask for it?’

There were no issues with this question. The RLS answered yes.

ER159: On which of the following issues have you or your health and safety representative colleagues received training?’

01) Fire safety; 02) Prevention of accidents; 03) Chemical, biological, radiation or dust hazards; 04) Ergonomics; 05) Violence, bullying or harassment; 06) Work-related stress; 07) Discrimination (for example due to age, gender, race or disability)

There were no issues with this question. The RLS said he received training in fire safety and prevention of accidents, but not in the other areas.

ER160: Is this training sufficient or would more training in any of these fields be desirable?

There were no issues with this question. The RLS believed that the training provided was sufficient. He had previously asked for some training on work-related stress and it was granted without problem.

7.6.6 OSH and organisational performance

MM402: How would you rate the level of absenteeism in your establishment compared with other establishments in the sector? Is it very high, quite high, about average, quite low or very low?

There were no issues with this question. The safety manager considered the levels of absenteeism very low. This had been identified when they carried out work to assess levels of work-related stress.

New question: Compared to other organisations of your size and sector in Italy, how well would you say you perform in terms of health and safety outcomes such as the number of accidents and injuries at work, and the level of sickness absence?

The safety manager did know the answer to this question as he had no comparable data on other organisations.

M403: How would you rate the current economic situation of this establishment? Is it very good, quite good, neither good nor bad, quite bad or very bad?

The interviewee did not know the answer. In the current economic climate the situation changes every day.

New question: Compared to other organisations of your size and sector in Italy, how well would you say you perform in terms of business outcomes such as profit, turnover or other relevant measures of performance?

The Safety manager answered 'I do not know' without providing any more explanation.

Any other issue

When asked whether he wanted to add something, the RLS said that survey could include a question on whether people find the existing H&S legislation adequate to the type of jobs that they do. The interviewee thought the legislative framework was unbalanced towards industrial and factory jobs and did not take account of the impact of technology on work environments and tasks.

'For us there is a huge gap between our reality and the regulations. The problem relates to changes in tasks and the jobs that are carried out. Twenty years ago if you asked someone what job they did they would answer with one word. Now with the new technologies and changes in industry, economy and society it is almost impossible to clearly define a job because there is a huge overlap in competences. This has implications also on H&S areas. For example the promoters, until five years ago they were creative people like film directors, that created a short promo and worked only with their creativity in the sense that they used other technicians on sound, videos etc... that would put together all the processes physically. Now he does everything with a computer, and you do not need five people anymore. This professional profile is now a terminal operator and he has to wear headphones and look at the screen all day long.'

RLS

8 Establishment Overview ID 81510

8.1 Establishment background

The organisation is a medium-sized municipality with approximately 700 employees.

8.2 Respondent profiles

The manager interviewed is the RSPP (*Responsabile del servizio di prevenzione e protezione*) and has been working for the municipality since 2005. She started as the RSPP and previously worked as a health and safety inspector. She has a background in chemistry. The manager was polite but showed little interest in the interview, she interrupted the interviews a few times to make phone calls, go for lunch, etc.

The employee representative is an RLS (*Rappresentante dei lavoratori per la sicurezza*, Workers' representative on health and safety). He has been working for the organisation since 1999 in maintenance and logistics support. He has held the position of RLS since 2000 and has been regularly elected by his colleagues. All those holding the position of RLS in the establishment are also union representatives.

8.3 Organisation of health and safety

There is a health and safety division within the municipality and the 'owner', the person legally responsible for it, is the mayor. The health and safety division comprises one RSPP, two employees in the prevention service ASP (*Addetti al servizio prevenzione*) and two RLSs (although by law they should be three, one still need to be appointed).

The municipality has more than 40 buildings scattered across the town, including offices, schools and sports buildings. The health and safety service of the municipality only covers people directly employed by the organisation. In some municipality buildings such as schools, staff are not employed by the municipality so are not covered. In cases where employees work in buildings owned by another organisation, the health and safety division covers the workers but not changes

made to the building. The RLS said this has significant implications on how risk assessments are carried out, and when problems are identified it is not always clear who is in charge of what.

Because of the complexity of the system it was difficult to focus the interviews on one area; sometimes they focussed on the building where the interviews took place (an office building) but sometimes they talked about the organisation as a whole.

8.4 Health and safety performance

The organisation did not complete the proforma.

8.5 Main technical issues

(issues with interpretation of questions, concepts and words; sensitivity of questions; problems in recall or reaching a judgment in answering)

MM155/ER200: Is there a documented policy, established management system or action plan on health and safety in your establishment?’

The Safety manager said that the organisation did not have a policy or management system. The RLS said that they did, but his answer showed that he did not understand the question.

‘Yes in the organisation as a whole, not in my directory. We are now doing the work related stress but we realised that there are areas that are strategically avoiding this. In my directory there is not attention to the planning, monitoring and evaluation of activities.

RLS

MM156/ER202: In practice, how much of an impact does this policy, management system or action plan have on health and safety in your establishment? Does it have a large impact, some impact, or practically no impact?

In Italy, all organisations have to have the statutory risk assessment documents, the DVR (*Documento di valutazione dei rischi*). In this case the organisation did not have a health and safety policy but the safety manager was doing a lot of work to improve health and safety and update the DVR. The RLS gave a positive answer to this question but referred to improvements made rather than any impact of a policy.

MM159/ER 214: Overall, how would you rate the degree of involvement of the line managers and supervisors in the management of health and safety? Is it very high, quite high, quite low or very low?

Interviewees asked whether the question was about managers in health and safety or other managers. The both explained that interest amongst managers and workers in the health and safety division was very high, but low in all other divisions. It may be worth clarifying to whom this question refers and whether safety managers should be included or not.

MM200/ER250: For each of the following issues, please tell me whether it is of major concern, some concern, or no concern at all in your establishment?

01) Dangerous substances (eg dusts, chemical, biological); 02) Accidents; 03) Noise and vibration; 04) Musculoskeletal disorders; 05) Work-related stress; 06) Violence or threat of violence; 07) Bullying or harassment

The reference point in question varied during the responses to different items. The organisation was a municipality, so sometimes the respondents spoke about concern for specific job roles, such as teachers or traffic police, or concern for all employees or all buildings owned by the municipality. Sometimes the risks considered were external rather than inherent in the workplace. For example, the safety manager believed that violence was a major problem for street police as they were involved in violent episodes with the public (external risks). In contrast bullying and harassment were not a concern as there were never any issues of this amongst employees (internal risks).

There were also some issues related to interpretation of the word 'concern'. For item 2 (accidents) the safety manager asked what was meant by 'concern', whether it meant a high level of accidents or the degree of interest from the organisation towards this issue. The RLS asked whether this question should include accidents during commuting time or during working time (Italian statistics include accidents during commuting hours).

'What do you mean by 'concern', in the sense that we have a high level of accidents or in the sense that we care about it?... For me concern is what comes from workers, when they do not feel protected and they ask for more attention on some factors. This is concern for me, when workers do not feel that their problems are taken seriously.'

Safety Manager

MM162: Are these risk assessments or workplace checks mostly conducted by your own staff or are they normally contracted to external service providers?

This question may provide better information if formatted as a multiple response question. The safety manager said that the routine checks were done by internal staff, but more technical assessments had to be carried out by external experts.

However, they were not performed by both internal and external staff both about equally.

MM164: Which of the following areas are routinely considered in these checks?

01) Equipment and working environment; 02) The way work is organised; 03) Irregular or long working hours; 04) Supervisor-employee relationships

The interviewee initially answered no to item 2 (the way work is organised) but then changed her mind after gaining clarification on the meaning of the 'way work is organised'. It may be useful to provide a short description of this into the question to avoid inconsistent interpretations. The question specifies whether the following areas are routinely considered. Although the interviewee said yes to item 2, she later specified that this was only if she thought it presented a risk rather than as a matter of course.

'For me the way work is organised refers to the internal organisation of the directorates. I consider the organisation of work in the risk assessment only when it can be a source of risk, such for example work-related stress; in this case I can recommend a change in the work organisation but then whether the directors take my advice on board is another story. There is nothing I can do about that.'

Safety Manager

In item 3, the interviewee answered no with the clarification that civil servants do not do long working hours. In this case she should have answered 'not applicable' rather than no.

MM163: On which occasions are these risk assessments or workplace checks carried out?'

01) Following a change in the staffing, layout or organisation of work; 02) At the request of employees eg in case of complaints; 03) At regular intervals, without any specific cause

The safety manager said yes to all items. However, from the interview it was clear that she was thinking about the workplace checks they carry out rather than the legal risk assessment process. As in previous questions she explained that they were still working on updating all areas of the statutory risk assessment documents.

MM166: And which of the following actions have been taken as a follow-up to these checks?

01) Changes to equipment or working environment; 02) Changes to the way work is organised; 03) Changes to working time arrangements; 04) Provision of training

The issue with this question related to the item 4 (provision of training). The safety manager answered yes to this, but it was clear that training came about as a result of other organisational processes, not as a follow-up action to workplace checks. The interviewee overlooked what the question was really asking.

'Yes a lot of training, I organise training very often, first because I realised that there was a lack of training to start with and then because regulations change every day and I try to keep up with this and provide training to employees as much as possible.'

Safety Manager

ER209: Do you have a say in the decisions on when and where these risk assessments or workplace checks are carried out?

The RLS did not provide a valid answer to this question and seemed uncomfortable admitting that he was not involved in either workplace checks or the legal risk assessment process. Instead his answer focused on the fact that the risk assessment document is complicated and difficult to understand. In Italy, RLSs are required by law to sign the risk assessment document, but there is no obligation for them to be involved in the risk assessment process and checks.

'It is difficult for all RLSs to check all risk assessment documents and understand what is written in the document. If I had to do it for all risk assessment documents I wouldn't have any time to work at all. So as RLSs we try to be as active as we can with prevention and information activities such as the weekly newsletter and meetings with workers. Then we try to act as quick as possible when we have reports on possible issues.'

RLS

ER211: And are you as health and safety representatives usually involved in the choice of follow-up actions?

Although the RLS answered yes to the question, it seemed that the right answer should actually have been no. In the explanation that followed, the interviewee told how RLSs were only sometimes involved in follow-up actions (for example for work-related stress) rather than usually involved. It may be useful to include more flexible response options such as 'it depends on the issue' or 'yes, sometimes'.

'Yes on some issues, such as work-related stress and other new procedures on traffic police. No on everything else, in the sense that the way work is organised and the structure of the organisation in general'

doesn't take into account contribution of the RLSs, only when they are forced to do it.'

RLS

MM172: In your establishment, what are the main difficulties in dealing with health and safety? Please tell me for each of the following whether it is a major difficulty, a minor difficulty, or not a difficulty at all. 01) A lack of resources such as time, staff or money; 02) A lack of awareness; 03) A lack of expertise; 04) A lack of technical support or guidance; 05) The culture within the establishment; 06) The sensitivity of the issue

The safety manager asked what was meant by 'sensitivity of the issue' and did not provide a valid answer for this question. His answer was unrelated to the question; he talked about the political system in Italy and the difficulties dealing with health and safety issues in a country run by fascist parties.

MM402: How would you rate the level of absenteeism in your establishment compared with other establishments in the sector? Is it very high, quite high, about average, quite low or very low?

New question: Compared to other organisations of your size and sector in Italy, how well would you say you perform in terms of health and safety outcomes such as the number of accidents and injuries at work, and the level of sickness absence?'

MM403: How would you rate the current economic situation of this establishment? Is it very good, quite good, neither good nor bad, quite bad or very bad?

The safety manager could not answer any of the above questions on OSH performance and economic standing as he did not have the data required.

New question: Compared to other organisations of your size and sector in Italy, how well would you say you perform in terms of business outcomes such as profit, turnover or other relevant measures of performance?

The safety manager said the question did not apply to their organisation as they were not a business. It may be worth adding an extra response option of 'not applicable'.

8.6 Summary of respondents' answers

8.6.1 Approach to management of health and safety

MM155/ER200: Is there a documented policy, established management system or action plan on health and safety in your establishment?'

The organisation does not have an H&S policy or management system. The safety manager explained that the municipality was working on completing the risk assessment document, the DVR, for all buildings and workers.

'We do not have a management system, this is not compulsory. We are behind with some aspects of health and safety management and we need to work on that. The management is not easy, we come from a situation that wasn't great we now need to even out the situation with the legislation and then we can think about a system. There is a general risk assessment document for all buildings; each building has its own specific document for risk assessment. There are some sectors that are not updated, buildings that still have the DVR according to the old legislation, not updated to the new decree. We have a plan to complete the new DVR for all buildings and we are getting through, it needs time as it's not that easy.'

Safety Manager

MM156/ER202: In practice, how much of an impact does this policy, management system or action plan have on health and safety in your establishment? Does it have a large impact, some impact, or practically no impact?

The safety manager did not answer this question as she said they had no policy. The RLS said that the policy had a large impact, although he mistook the statutory risk assessment process for evidence of a 'policy'. He said that awareness had increased and systems had improved since the safety manager was appointed.

MM159/ER 214: Overall, how would you rate the degree of involvement of the line managers and supervisors in the management of health and safety? Is it very high, quite high, quite low or very low?

According to the safety manager, the degree of involvement of managers in general was very low. She lamented the lack of interest in health and safety issues and the total absence of knowledge and awareness in the organisation. She also pointed out that all managers were over 50 and less open to change.

'There are managers that do not participate, do not care about health and safety. We have also done a quarterly magazine to inform and raise awareness on these issues, which is sent to all employees both by email and on paper. We also adhere to the European week on health and safety, so from the health and safety team the interest is very high, but from other

managers and directors or areas the cooperation is close to nil. If the managers and directors do not believe in it, obviously, employees do not understand the importance of the topic and do not participate in training courses or activities related to health and safety. What is missing is the culture of prevention; not even the directors or managers participate in training courses. The directors of areas are all over 50 and this also plays a role.'

Safety Manager

The RLS believed that the degree of involvement of line managers and supervisors was quite low. He explained how the bonuses for civil servant managers were based solely on productivity, which often led managers to disregard health and safety issues. From his point of view, the cuts on staff and increasing use of short term contracts exacerbated the situation.

8.6.2 Levels of concern with OSH risks

MM200/ER250: For each of the following issues, please tell me whether it is of major concern, some concern, or no concern at all in your establishment? 01) Dangerous substances (eg dusts, chemical, biological); 02) Accidents; 03) Noise and vibration; 04) Musculoskeletal disorders; 05) Work-related stress; 06) Violence or threat of violence; 07) Bullying or harassment

Dangerous substances were of no concern to the safety manager or RLS as no dangerous substances were used. Accidents were a major concern for the safety manager, as there is always a certain likelihood of an accident occurring somewhere. For the RLS these were of some concern. Noise and vibration were not considered a concern by the safety manager. In contrast, the RLS thought these were a major concern as he worked outside and was exposed to lots of noise and vibration. MSDs were of some concern to the safety manager, in respect of teachers and logistic workers, but not office workers. In contrast, the RLS believed that these were a major concern, precisely because they affect office workers. According to the safety manager work-related stress was a concern, mainly because it affected teachers. The RLS said this was a major concern as the work-related stress assessment had found high levels of stress amongst teachers and traffic police. Violence was considered a major concern by both interviewees, mainly because traffic police were often involved in episodes of violence on the streets. Bullying and harassment was of no concern at all.

8.6.3 Approach to risk assessment

MM161/ER207: Are workplaces in the establishment regularly checked for safety and health as part of a risk assessment or similar measures?

There were no issues with this question. Both the safety manager and RLS answered yes. The safety manager specified that fire emergency team were instructed to check the buildings every month. For the safety manager 'regularly'

meant periodically, like every month. The RLS added that regular checks had only recently been introduced; prior to 2000 there were buildings that had never been checked, such as warehouses and traffic police offices.

MM162: Are these risk assessments or workplace checks mostly conducted by your own staff or are they normally contracted to external service providers?

The routine checks were carried out by internal teams but more technical assessments of risks such as vibrations and electromagnetic fields were conducted by external experts.

MM163: On which occasions are these risk assessments or workplace checks carried out?

01) Following a change in the staffing, layout or organisation of work; 02) At the request of employees eg in case of complaints; 03) At regular intervals, without any specific cause

Workplace checks were carried out on all occasions listed.

MM164: Which of the following areas are routinely considered in these checks?'

01) Equipment and working environment; 02) The way work is organised; 03) Irregular or long working hours; 04) Supervisor-employee relationships

The safety manager answered yes to all items presented except item 3 as they do not work irregular or long working hours.

MM166: And which of the following actions have been taken as a follow-up to these checks?

01) Changes to equipment or working environment; 02) Changes to the way work is organised; 03) Changes to working time arrangements; 04) Provision of training

The safety manager declared that changes had been made in all areas except for item 3 (working time arrangements) as these are already fairly favourable for civil servants.

ER209: Do you have a say in the decisions on when and where these risk assessments or workplace checks are carried out?

The RLS did not provide a valid answer to this question. He focussed on the fact that the risk assessment document was rather complicated and difficult to understand.

ER210: If the risk assessment or workplace check identifies a need for action: Is the necessary follow-up action taken?

There were no issues with this question. The RLS answered yes but specified that the timeliness of these depended on whether the issues were likely to require input from an inspector; minor issues were never solved.

ER211: And are you as health and safety representatives usually involved in the choice of follow-up actions?

The RLS was involved in some issues, such as work-related stress and procedures with traffic police, but not all issues.

8.6.4 Drivers of and barriers to management of health and safety

MM171: In your establishment, how important are the following reasons for addressing health and safety? For each one, please tell me whether it is a major reason, a minor reason, or no reason at all.'

01) Fulfilment of legal obligation; 02) Requests from employees or their representatives; 03) Staff retention and absence management; 04) Economic or performance-related reasons; 05) Requirements from clients or concern about the organisation's reputation; 06) Pressure from the labour inspector

There were no issues with this question. Fulfilment of legal obligation, requests from clients and pressure from the labour inspector were all deemed major reasons for addressing health and safety. The safety manager explained adhering to legal obligations and controls from labour inspectors were an absolute priority.

'Legal requirements and controls are the real reasons, everything else is just optional.'

Safety Manager

Requests from employees and economic or performance-related reasons were considered minor reasons for addressing health and safety. Staff retention and absence management was not a reason for addressing health and safety.

MM172: In your establishment, what are the main difficulties in dealing with health and safety? Please tell me for each of the following whether it is a major difficulty, a minor difficulty, or not a difficulty at all.'

01) A lack of resources such as time, staff or money; 02) A lack of awareness; 03) A lack of expertise; 04) A lack of technical support or guidance; 05) The culture within the establishment; 06) The sensitivity of the issue

All reasons presented were considered a major difficulty, except for lack of technical support and guidance which was a minor difficulty. No answer was given

for item 6 (the sensitivity of the issue) as this was not well understood, The safety manager lamented a general lack of interest in and knowledge of health and safety issue across managers and employees. The lack of interest amongst senior managers meant that she had insufficient resources to do her job properly whilst the negative culture amongst employees meant that many refused to do any health and safety training.

'There is a lack of awareness of the importance of health and safety. If employees and directors understood the reasons why health and safety is important, then everything would be easier for me and I wouldn't have to fight on this issue every day. This the culture of civil servants.'

Safety Manager

8.6.5 Worker participation and involvement

ER102: Is there a permanent committee or working group consisting of members of the management and representatives of the employees dealing with safety and health in this establishment?

This question was well understood. There was no permanent committee or working group on health and safety.

ER205 : Are employees in this establishment regularly informed about safety and health in the workplace?

This question was well understood. The RLS said that employees were regularly informed with emails, and a weekly newsletter.

ER107 - How often do controversies related to safety and health arise between the management and the employee representatives? Is this often, sometimes, or practically never the case?

There were no issues with this question. The RLS stated that there were often controversies between employees and management. By management he meant those above the safety manager with responsibilities for finances.

'... there is strong collaboration with the new RSPP, but there is zero collaboration with the political people in charge and those responsible for planning and budgeting. The RSPP does a lot and we appreciate that, but we are not satisfied with the directors in charge, for example we asked for a rethink of the work organisation in some sectors and nothing happened. There is a gap between the collaboration with technical people, such as the RSPP, and the collaboration with directors and politicians who have a different agenda.'

RLS

ER215_05: Please tell me whether you agree (1), neither agree nor disagree (2), or disagree (3) with the following statement: 'Our management gives proper consideration to occupational safety and health issues raised by employees or their representatives'

There were no issues with this question. The RLS neither agreed nor disagreed with the statement. He explained that the interest and awareness was uneven across divisions; it was low in directorates that externalised services and used non-standard contracts and better in divisions with a greater number of internal staff with regular contracts.

'It varies widely between directorates. In some directorates the situation is getting worse because they are externalising all services and there are no controls on contracting companies. The real problem in Italy is the poor condition of contracting work, widely used to provide public services.'

RLS

ER150: Do you as the employee representative for safety and health usually get sufficient time off from normal duties to perform these tasks adequately?

There were no issues with this question. The RLS lamented the lack of time. He said they had an equivalent of two days per year for training and carrying out their health and safety responsibilities, which was not enough.

ER154: Does the management provide you with the necessary information for carrying out your health and safety tasks properly?

There were no issues with this question. The RLS said yes, and explained that there was a good collaboration between RLSs and the safety manager.

ER155: Do you usually receive information on time and without having to ask for it?

There were no issues with this question. The RLS answered no did not elaborate on the reasons why.

ER159: On which of the following issues have you or your health and safety representative colleagues received training?

01) Fire safety; 02) Prevention of accidents; 03) Chemical, biological, radiation or dust hazards; 04) Ergonomics; 05) Violence, bullying or harassment; 06) Work-related stress; 07) Discrimination (for example due to age, gender, race or disability)

This question was well understood. The RLS had only received training on chemical, biological, radiation or dust hazards, but thought that more training was in the pipeline.

ER160: Is this training sufficient or would more training in any of these fields be desirable?

There were no issues with this question. The RLS said that more training would be desirable. He said the amount required depended on how much the organisation involved RLSs; the more involved they were, the more training they would need.

8.6.6 OSH and organisational performance

MM402: How would you rate the level of absenteeism in your establishment compared with other establishments in the sector? Is it very high, quite high, about average, quite low or very low?

The Safety manager did not know the answer to the question, as there are no statistics on absenteeism in municipalities.

New question: Compared to other organisations of your size and sector in Italy, how well would you say you perform in terms of health and safety outcomes such as the number of accidents and injuries at work, and the level of sickness absence?'

The safety manager did not know the answer to this question and believed this was the same question as MM402.

MM403: How would you rate the current economic situation of this establishment? Is it very good, quite good, neither good nor bad, quite bad or very bad?

The Safety manager did not know because he lacked the data required.

New question: Compared to other organisations of your size and sector in Italy, how well would you say you perform in terms of business outcomes such as profit, turnover or other relevant measures of performance?

The safety manager said the question did not apply to them as they were not a business.

9 Establishment Overview ID 92410

9.1 Establishment background

The company is a medium-sized organisation in the health care sector. At the time of the interview it was in compulsory administration due to financial difficulties. The organisation is publicly owned but employees have a private-sector contract (this was one of the measures adopted two years earlier to save the company from bankruptcy). The organisation provides care home services to elderly people. There are 250 employees in total including social workers, nurses, physiotherapists, doctors and administrative personnel. Of these, 40 are on temporary contracts.

9.2 Respondent profiles

The safety manager interviewed is the RSPP (*Responsabile del servizio di prevenzione e protezione*, Responsible for the Prevention and Protection Service). He has held this role in the company since 2007. He has always worked as an RSPP, mostly as an external consultant. He is also the HR manager of the company.

The RLS (*Rappresentante dei lavoratori per la sicurezza*, Workers' representative on health and safety) is a social worker. He has worked in the organisation since 2006 and has been an RLS since 2011 having been regularly elected by his colleagues. He is also a union representative.

9.3 Organisation of health and safety

The organisation has four care homes. In each of these there is a doctor in charge of the site and responsible for health and safety. For each building there is also a surveyor in charge of the maintenance of the buildings whose responsibilities also included health and safety.

The company is the oldest in the region, founded in 1800, and its buildings are considered historical heritage. According to the RLS, this means that the buildings are not suitable for the type of support and service offered but major renovation works cannot be carried out because the buildings are protected. Another contextual issue mentioned by the RLS is that the company complies with the minimum legal requirement for the number of social workers and nurses required. As many patients have high levels of needs, this means that they are significantly under-resourced.

The transition from public to private management of the workforce means that RLSs have only been elected in the establishment in the last two years.

9.4 Health and safety performance

The company did not provide the completed proforma.

9.5 Main technical issues

(issues with interpretation of questions, concepts and words; sensitivity of questions; problems in recall or reaching a judgment in answering)

MM155/ER200: Is there a documented policy, established management system or action plan on health and safety in your establishment?’

It was not clear to the respondents what was meant by a ‘policy’ or ‘management system’. Both respondents referred to procedures in place rather than policies; the safety manager mentioned that the health doctors carried out regular visits every two years according to regional guidelines and the RLS explained that there were procedures in place as part of the statutory risk assessment document. The RLS added that these procedures were often ignored.

MM156/ER202: In practice, how much of an impact does this policy, management system or action plan have on health and safety in your establishment? Does it have a large impact, some impact, or practically no impact?

The safety manager answered that the policy had a large impact on the organisation, and the RLS some impact. However, since MM155/ER200 were misinterpreted, their responses related to the impact of procedures rather than policies.

MM159/ER 214: Overall, how would you rate the degree of involvement of the line managers and supervisors in the management of health and safety? Is it very high, quite high, quite low or very low?

In this question the interviewees interpreted ‘involvement’ as degree of interest towards H&S issues, but talked about different groups as ‘line managers and supervisors’. The safety manager referred to himself and the site managers and rated involvement as very high. In contrast, the RLS rated involvement as very low but specified that his judgement was about the organisation as a whole, rather than the safety manager and site managers who he thought were quite involved.

MM200/ER250: For each of the following issues, please tell me whether it is of major concern, some concern, or no concern at all in your establishment? 01) Dangerous substances (eg dusts, chemical, biological); 02) Accidents; 03) Noise and vibration; 04) Musculoskeletal disorders; 05) Work-related stress; 06) Violence or threat of violence; 07) Bullying or harassment

There were a number of issues on this question related to the term ‘concern’, and whether a risk should be a concern because it is present or because it is not well controlled. The responses from the safety manager appeared to be influenced by social desirability bias; he was careful to avoid saying that he was concerned about something. He specified that for him the right word was ‘attention’ rather than ‘concern’. Where the answer should have been ‘major concern’ he said the risk received ‘great attention’ instead (although he was happy to say a risk was not a concern if it was not an issue).

‘I wouldn’t say that I’m concerned, I would say that there is a great attention on these issues.’

Safety Manager

MM161/ER207: Are workplaces in the establishment regularly checked for safety and health as part of a risk assessment or similar measures?

When answering this question the safety manager referred to the compulsory updates to the legal risk assessment document required when there are major changes in the workplace, rather than any routine checks. The example he gave was the risk assessment they performed when a room used as a library was turned into a pharmacy. While, the RLS interpreted the questions correctly.

MM166: And which of the following actions have been taken as a follow-up to these checks?

01) Changes to equipment or working environment; 02) Changes to the way work is organised; 03) Changes to working time arrangements; 04) Provision of training

The safety manager said that actions had been taken in all areas included in the question. This seemed to contradict his description following MM164, where he said that equipment and working environment were the only areas routinely checked. It was clear that his answers included changes that had been made as a result of processes other than risk assessments; when answering item 4 he referred to training that was provided to employees every year according to their contract.

ER209: Do you have a say in the decisions on when and where these risk assessments or workplace checks are carried out?

The answer to this question was yes. However, the RLS has to ask exactly what was meant by the question and clarified that although they are allowed to complain or have an input, these are often ignored. In general he felt that there was a lack of collaboration between himself and the safety manager.

'Yes, we can but it doesn't mean that they do it. RLSs are seen as a nuisance.'

RLS

ER210: If the risk assessment or workplace check identifies a need for action: Is the necessary follow-up action taken?

The RLS answered yes, but complained that his organisation only made the minimum changes required by law. As such actions taken were not always sufficient to properly resolve the issues. The RLS pointed out that this question does not accurately identify what is really happening on the ground.

'Yes, in the risk assessment document. But this doesn't mean that they solve the problem. For example, we never had a fire and this looks great in the risk assessment document, but the fire alarm doesn't work and if we do have a fire we cannot evacuate the beds because they do not go inside the lifts and we do not have the instruments to get through the stairs. You see that there is a difference.'

RLS

MM172: In your establishment, what are the main difficulties in dealing with health and safety? Please tell me for each of the following whether it is a major difficulty, a minor difficulty, or not a difficulty at all.'

01) A lack of resources such as time, staff or money; 02) A lack of awareness; 03) A lack of expertise; 04) A lack of technical support or guidance; 05) The culture within the establishment; 06) The sensitivity of the issue

In some cases, the safety manager would have preferred a mid-scale response option. A lack of resources for him was a difficulty *'in between major and minor'* whilst the culture of the establishment and the sensitivity of the issue both presented *'medium'* difficulties.

ER159: On which of the following issues have you or your health and safety representative colleagues received training?01) Fire safety; 02) Prevention of accidents; 03) Chemical, biological, radiation or dust hazards; 04) Ergonomics; 05) Violence, bullying or harassment; 06) Work-related stress; 07) Discrimination (for example due to age, gender, race or disability)

In this question it was difficult for the RLS to distinguish between the training he had received as an employee and as an RLS. He also asked for the meaning of 'ergonomics' to be explained.

New question: Compared to other organisations of your size and sector in Italy, how well would you say you perform in terms of health and safety outcomes such as the number of accidents and injuries at work, and the level of sickness absence?'

The safety manager did not have any data on which to base his answer. This question should include an 'don't know' or 'no answer' option.

New question: Compared to other organisations of your size and sector in Italy, how well would you say you perform in terms of business outcomes such as profit, turnover or other relevant measures of performance?'

The safety manager did not think this question applied to them as they are a public organisation so do not benchmark themselves in terms of business outcomes.

9.6 Summary of respondents' answers

9.6.1 Approach to management of health and safety

MM155/ER200: Is there a documented policy, established management system or action plan on health and safety in your establishment?'

Both the safety manager and RLS said that there was a policy in the establishment, although as mentioned above their responses referred to procedures on OSH rather than a written policy.

MM156/ER202: In practice, how much of an impact does this policy, management system or action plan have on health and safety in your establishment? Does it have a large impact, some impact, or practically no impact?'

The safety manager believed that the policy (or rather their health surveillance procedures, see above) had a large impact on the organisation as they now have a monitoring system in place. The RLS believed the policy (or rather their risk assessment procedures, see above) had some impact. However, he pointed out

that the risk assessment document was merely a tick box exercise; employees did not follow guidelines on OSH and the organisation did not deal with significant issues such as inadequate fire doors and problems evacuating bed-bound patients during emergencies.

‘Yes, there is an impact at least people know that there are rules to follow. The problems are on the safety of buildings ... The risk assessment process cannot change this situation because even if on paper you have responsibilities, in reality no one is ever legally responsible if something happens and they do not care.’

RLS

MM159/ER 214: Overall, how would you rate the degree of involvement of the line managers and supervisors in the management of health and safety? Is it very high, quite high, quite low or very low?

The degree of involvement of managers and supervisors was considered very high by the safety manager (who referred to himself and site managers) and very low by the RLS (who referred to the organisation as a whole).

9.6.2 Levels of concern with occupational safety and health risks

MM200/ER250: For each of the following issues, please tell me whether it is of major concern, some concern, or no concern at all in your establishment? 01) Dangerous substances (eg dusts, chemical, biological); 02) Accidents; 03) Noise and vibration; 04) Musculoskeletal disorders; 05) Work-related stress; 06) Violence or threat of violence; 07) Bullying or harassment

01) Dangerous substances: the safety manager said that ‘great attention’ was paid to biological substances, and the RLS rated these as of some concern. The reason for both was the presence of patients with HIV or hepatitis, but they said these risks were under control.

02) Accidents: the safety manager said that these were no concern at all because there was a low incidence of accidents. In contrast, the RLS rated these as of some concern because he thought shortages of staff were leading to an increase in these.

03) Noise and vibration were not a concern for either the safety manager or RLS since there was no source of risk.

04) MSDs: the safety manager said that ‘great attention’ was given to this topic as it was the main risk present in the workplace. In contrast, the RLS believed that this was a major concern as he thought that these risks were not properly controlled.

‘Yes, this is the most important [risk]. There is a great attention given to manual handling ... unfortunately this is still the biggest issue here, it doesn’t matter how well you control this risk there will always be problems...’

because our workforce is around 50 years old and when you do this job for 15 years you feel it.'

Safety Manager

'This is the main problem here. We do not have any technical support to move the patients, everything has to be done by workers and we are also understaffed. Think of the disastrous consequences on our bodies.'

RLS

05) Work-related stress: this was not a concern to the safety manager since the risk assessment on stress did not find any particular issues. In contrast, it was a major concern for the RLS who said that the topic was a 'taboo' and described the risk assessment on this as 'simply a joke'.

06) Violence and bullying or harassment: this was not a concern to the safety manager, although he added that there were sometimes violent episodes from relatives. In contrast, violence was a major concern for the RLS due to verbal and physical attacks from relatives and patients.

07) Bullying and harassment: this was of no concern to the safety manager who could not recall any incidences of this. However, it was of some concern to the RLS, who explained that employees came from different background and nationalities so sometimes struggled to get on.

9.6.3 Approach to risk assessments

MM161/ER207: Are workplaces in the establishment regularly checked for safety and health as part of a risk assessment or similar measure?

Yes, these are carried out regularly in the establishment. For the safety manager, 'regularly' meant every year.

MM162: Are these risk assessments or workplace checks mostly conducted by your own staff or are they normally contracted to external service providers?

There were no issues with this question. Risk assessments are carried out by an external consultancy, contracted to carry out a number of OSH tasks including carrying out checks, providing training to employees, consulting on new legislation, and updating certificates on fire prevention and evacuation procedures.

MM163: On which occasions are these risk assessments or workplace checks carried out?01) Following a change in the staffing, layout or organisation of work; 02) At the request of employees eg in case of complaints; 03) At regular intervals, without any specific cause

There were no issues with this question. The risk assessments are carried out only in the situation of item 3, at regular intervals without any specific cause.

MM164: Which of the following areas are routinely considered in these checks?

01) Equipment and working environment; 02) The way work is organised; 03) Irregular or long working hours; 04) Supervisor-employee relationships

There were no issues with this question. The only areas that are routinely considered are equipment and the working environment. The way work is organised is considered only in the case of major changes. Irregular working hours and supervisor-employees relations do not form part of health and safety checks. However, in the interview with the RLS it emerged that long working-hours and understaffing were major issues in the organisation. It was also apparent that the relationship between the safety manager and the RLS was tense, and the RLS lamented that difficult relationships between employees was ignored by the organisation.

MM166: And which of the following actions have been taken as a follow-up to these checks?

01) Changes to equipment or working environment; 02) Changes to the way work is organised; 03) Changes to working time arrangements; 04) Provision of training

The Safety manager said that actions had been taken in all areas included in the question, although as mentioned above some of these did not occur as a result of a risk assessment.

ER209: Do you have a say in the decisions on when and where these risk assessments or workplace checks are carried out?

The RLS answered 'yes', but said that his involvement was only on paper as his suggestions were regularly ignored.

ER210: If the risk assessment or workplace check identifies a need for action: Is the necessary follow-up action taken?

The RLS answered 'yes', but said that changes were minimal. Although they met the requirements of the legislation they were often inadequate.

ER211: And are you as health and safety representatives usually involved in the choice of follow-up actions?

There were no issues with this question. The RLS said that they were not involved in follow-up actions, but only asked to sign the risk assessment document as required by the legislation.

9.6.4 Drivers of and barriers to management of health and safety

MM171: In your establishment, how important are the following reasons for addressing health and safety? For each one, please tell me whether it is a major reason, a minor reason, or no reason at all.

01) Fulfilment of legal obligation; 02) Requests from employees or their representatives; 03) Staff retention and absence management; 04) Economic or performance-related reasons; 05) Requirements from clients or concern about the organisation's reputation; 06) Pressure from the labour inspector

There were no issues with this question. The major reasons for addressing H&S were fulfilment of legal obligation, staff retention and absence, requirements from clients and pressure from the labour inspector. Economic or performance-related reasons and requests from employees were considered minor reasons.

MM172: In your establishment, what are the main difficulties in dealing with health and safety? Please tell me for each of the following whether it is a major difficulty, a minor difficulty, or not a difficulty at all.

01) A lack of resources such as time, staff or money; 02) A lack of awareness; 03) A lack of expertise; 04) A lack of technical support or guidance; 05) The culture within the establishment; 06) The sensitivity of the issue

The Safety manager said that a lack of awareness, expertise and technical support were not difficulties in dealing with health and safety. He did not provide a valid answer for the other items.

9.6.5 Worker participation and involvement

ER102: Is there a permanent committee or working group consisting of members of the management and representatives of the employees dealing with safety and health in this establishment?

There were no issues with this question. The organisation did not have a permanent committee or working group on health and safety.

ER205 : Are employees in this establishment regularly informed about safety and health in the workplace?

There were no issues with this question. The RLS felt that employees were not informed about health and safety issues.

ER215_05: Please tell me whether you agree (1), neither agree nor disagree (2), or disagree (3) with the following statement: 'Our management gives proper consideration to occupational safety and health issues raised by employee or their representatives'

There were no issues with this question. The RLS disagreed with the statement, mentioning again the lack of interest in health and safety in the organisation. His main concerns were that significant health and safety issues in the building had not been resolved and that external contractors did not follow basic rules concerning OSH in the wards.

ER107: How often do controversies related to safety and health arise between the management and the employee representatives? Is this often, sometimes, or practically never the case?

There were no issues with this question. The RLS said there had often been controversies, largely due to the reluctance of management to take into account employees' complaints.

ER150: Do you as the employee representative for safety and health usually get sufficient time off from normal duties to perform these tasks adequately?

There were no issues with this question. The RLS said no, they carry out all tasks and duties as RLS and union reps in their own time outside working hours.

ER154: Does the management provide you with the necessary information for carrying out your health and safety tasks properly?

There were no issues with this question. The RLS said no, there is a complete lack of collaboration between the safety manager and himself.

ER155: Do you usually receive information on time and without having to ask for it?

There were no issues with this question. In line with the response to ER154, the RLS said no and restated that was no collaboration between the safety manager and himself.

ER159: On which of the following issues have you or your health and safety representative colleagues received training? 01) Fire safety; 02) Prevention of accidents; 03) Chemical, biological, radiation or dust hazards; 04) Ergonomics; 05) Violence, bullying or harassment; 06) Work-related stress; 07) Discrimination (for example due to age, gender, race or disability)

The RLS had received training in fire safety, prevention of accidents, chemical and biological hazards, work-related stress and discrimination, but not in ergonomics and violence or bullying.

ER160: Is this training sufficient or would more training in any of these fields be desirable?

There were no issues with this question. The RLS said that more training would be desirable.

9.6.6 OSH and organisational performance

MM402: How would you rate the level of absenteeism in your establishment compared with other establishments in the sector? Is it very high, quite high, about average, quite low or very low?

There were no issues with this question. The level of absenteeism was considered about average. The safety manager based his answer on his knowledge of the sector and informal chats with his peers in other establishments.

New question: Compared to other organisations of your size and sector in Italy, how well would you say you perform in terms of health and safety outcomes such as the number of accidents and injuries at work, and the level of sickness absence?'

The Safety manager could not answer this as he said he had no data on which to base his answer.

MM403: How would you rate the current economic situation of this establishment? Is it very good, quite good, neither good nor bad, quite bad or very bad?

There were no issues with this question. The organisation was under compulsory administration so the safety manager said the situation was very bad.

New question: Compared to other organisations of your size and sector in Italy, how well would you say you perform in terms of business outcomes such as profit, turnover or other relevant measures of performance?

The Safety manager could not answer this question as the company is a public organisation so does not make a profit.

Any other issues

At the end of the interview the RLS added that the health and safety legislation in Italy (*The Testo Unico 81*) was completely inadequate for the type of work carried out in social services and nursing homes. According to him the legislation was based on industry work, so factory-based work environments and processes quite different to their own.

'It is designed more for the industry, we are not in a factory, we have issues that are not even mentioned in the legislation, or if they are mentioned they are not appropriate for a ward. It is ok to follow that regulation when everything is ok but when there are issues it is a big problem.'

RLS

Another issue was the presence of external workers, such as workers from cleaning and catering companies, who lacked interest in and training on basic health and safety rules to follow in a hospital environment. The organisation offers no induction for these workers and the health and safety procedures of their employing agencies are not checked.

'External workers are not checked by anyone, they do whatever they want. For example when they clean the floor they do not use the drying cloths, so we have to walk on wet floors, and no one says anything, because the organisation says this is not our responsibility. Or they never disinfect their hands so what's the points of rules on [avoiding] biological risks?'

RLS

10 Establishment Overview ID 102610

Note: The interview was carried out with the safety manager and his assistant (the operational safety manager) who helped with managing and running the day-to-day health and safety (H&S) activities. The interview was held in the office of the safety manager and they refused to be interviewed separately. Although an appointment had been made to interview an employee representative, on the day of the interview the safety manager said this person was busy and politely refused to fix another appointment. Therefore, the questions for employee representatives were not answered.

10.1 Establishment background

The company is responsible for managing infrastructures and buildings for one airport in Italy. The company does not work directly with passengers or baggage but coordinates other companies that do. It is also responsible for the organisation of flows (passenger, goods, etc.) at the airport. There are approximately 380 employees of whom around ten to 15 are seasonal workers (the operational safety manager thought this number was much higher but did not have any exact figures). The company and workers are organised into three areas: administrative staff, technical staff and operational staff.

10.2 Respondent profiles

The safety manager is the RSPP (*Responsabile per il servizio di prevenzione e protezione*, Responsible for prevention and protection service) of the company and other controlled¹ companies. He has worked for the company since 2003. He holds a degree in civil engineering and had done all the training for RSPPs required by the legislation. The operational safety manager has been in the

1 A controlled company is one for which a majority of the voting shares are held by another company.

company since 2009 and has a degree in civil engineering plus has received training in H&S.

10.3 Organisation of health and safety

The internal structure of H&S in the establishment was rather simple with the safety manager as RSPP responsible for the implementation of all H&S procedures and activities, plus the operational safety manager who was in charge of the daily activities on H&S.

10.4 Health and safety performance

The company did not provide the proforma.

10.5 Main technical issues

(issues with interpretation of questions, concepts and words; sensitivity of questions; problems in recall or reaching a judgment in answering)

MM155/ER200: Is there a documented policy, established management system or action plan on health and safety in your establishment?

The safety manager could not provide a yes or no answer to this question, because the company did not have a documented 'policy' but did have documents, plans and clear objectives on H&S management. He appeared to focus on the word 'documented policy' in the question and overlooked the other items of 'management system' and 'action plan'.

'It is yes and no, in the sense that we do not have a documented policy, but we have plans and specific management procedures on H&S. The basic document is the risk assessment document, then when this is not enough we also have other internal documents and procedures to ensure H&S standards.'

Safety Manager

'For example we have formal H&S procedures, training plans, clear objectives to be met with deadlines, etc.'

Operational Safety Manager

MM156/ER202: In practice, how much of an impact does this policy, management system or action plan have on health and safety in your establishment? Does it have a large impact, some impact, or practically no impact?

This question was asked even though the safety manager had said neither yes nor no to MM155. The safety manager wasn't sure how to quantify the terms 'large

impact' or 'some impact'. He answered 'some impact', but then he explained that the impact was significant.

'There is certainly some impact. Now, I don't know what you mean for large impact or some impact, how to assess this in quantitative terms, but there is for sure a significant impact.'

Safety Manager

MM159/ER 214: Overall, how would you rate the degree of involvement of the line managers and supervisors in the management of health and safety? Is it very high, quite high, quite low or very low?

The safety manager took some time before saying that involvement was quite high. When asked who he had in mind for 'line managers and supervisors' ('*direzione e dirigenti*' in the Italian version) he said he was thinking about the director of the company and the directors of the different areas. He couldn't give an overall assessment and specified that the involvement of the overall director was quite high, whilst the involvement of the area directors was very high. He appeared to interpret 'involvement' as awareness of H&S issues and the extent to which directors thought of H&S as a priority. He explained that due to the company activity and the technical background of directors, there is in general a high awareness and knowledge of H&S issues.

'In general there is great attention paid to H&S issues, considering the activities that we do, also all managers are technicians and they are very aware of H&S.'

Safety Manager

The operational safety manager agreed with the safety manager on this question.

MM161/ER207: Are workplaces in the establishment regularly checked for safety and health as part of a risk assessment or similar measures?

In this question the term 'establishment' was interpreted to mean all areas controlled by the organisation, not only the establishment where the organisation was based. This included terminals, passenger areas, and all internal and external areas of the airport. It was clear from the interviews that both respondents included all types of checks in their answer, from those carried out as part of a risk assessment to routine checks and checks carried out following issues raised by employees.

'Absolutely yes, of course, we carry out checks in all areas. These can be daily, weekly or monthly, it depends on the need and procedures. We are also always present everywhere, so whenever an employee sees an issue we check it immediately.'

Safety Manager

MM166: And which of the following actions have been taken as a follow-up to these checks? 01) Changes to equipment or working environment; 02) Changes to the way work is organised; 03) Changes to working time arrangements; 04) Provision of training

The safety manager answered yes to item 4, 'provision of training'. However, after probing it came out that his answer was not related to follow-up actions (as specified by the question), but to regular training provided to employees or training provided following changes to machinery and working processes.

MM200/ER250: For each of the following issues, please tell me whether it is of major concern, some concern, or no concern at all in your establishment? 01) Dangerous substances (eg dusts, chemical, biological); 02) Accidents; 03) Noise and vibration; 04) Musculoskeletal disorders; 05) Work-related stress; 06) Violence or threat of violence; 07) Bullying or harassment

The safety manager and operational safety manager simultaneously stated that they did not like the word 'concern' (*preoccupazione* in the Italian version) because they were not 'worried' about the risks, but rather were aware of them and worked on controlling them. They preferred to say that the risks received 'attention'.

'I wouldn't use the word 'concern' in the sense that we are not worried, and there is great attention towards H&S.'

Safety Manager

'It is more that we are very aware of the risks and we do everything needed to control them. It's not that we are concerned because we do not know the risks or we did not assess the risk. We checked the risks and we keep them monitored and controlled.'

Operational Safety Manager

When asked what 'concerned' meant for them, they replied that related to situations where there risks were not controlled or the organization was not able to give an appropriate answer to a problem.

'For me there is a concern when there is a risk that is not correctly assessed or the organisation does not have the capacity to properly control a risk. In this case there is an unknown or uncontrolled area or factors that produce anxiety, worries and concern.'

Safety Manager

MM171: In your establishment, how important are the following reasons for addressing health and safety? For each one, please tell me whether it is a major reason, a minor reason, or no reason at all. 01) Fulfilment of legal obligation; 02) Requests from employees or their representatives; 03) Staff retention and absence management; 04) Economic or performance-related reasons; 05) Requirements from clients or concern about the organisation's reputation; 06) Pressure from the labour inspector

The safety manager thought about item 4 on 'economic and performance-related reasons' and then said it unclear what this was getting at. In the end he interpreted the question as asking whether economic reasons present an obstacle to addressing H&S.

'Economic reasons are neither major nor minor, in the sense that if something needed to be done, we do it regardless the costs. In this sense I would say that this is a minor reason.'

Safety Manager

MM172: In your establishment, what are the main difficulties in dealing with health and safety? Please tell me for each of the following whether it is a major difficulty, a minor difficulty, or not a difficulty at all. 01) A lack of resources such as time, staff or money; 02) A lack of awareness; 03) A lack of expertise; 04) A lack of technical support or guidance; 05) The culture within the establishment; 06) The sensitivity of the issue

After the first item the safety manager asked for all items to be read out before he gave an answer. Afterwards, he said that resources such as money and staff were the main difficulties in the sense that he had to set priorities. This contradicted with the answer given for item 4 in MM171 above where he said that actions were taken regardless of the costs.

MM402: How would you rate the level of absenteeism in your establishment compared with other establishments in the sector? Is it very high, quite high, about average, quite low or very low?

New Question: Compared to other organisations of your size and sector in Italy, how well would you say you perform in terms of health and safety outcomes such as the number of accidents and injuries at work, and the level of sickness absence?

For both of these questions, the safety manager said he did not have any data on other establishments against which to compare their performance.

10.6 Summary of respondents' answers

10.6.1 Approach to management of health and safety

MM155/ER200: Is there a documented policy, established management system or action plan on health and safety in your establishment?

The safety manager did not provide a yes or no answer. He stated that the company did not have a documented policy but did have formal plans and programmes on H&S.

MM156/ER202: In practice, how much of an impact does this policy, management system or action plan have on health and safety in your establishment? Does it have a large impact, some impact, or practically no impact?

The safety manager said that the procedures mentioned in MM155 had some impact on the organisation. He thought the impact was on work procedures carried out both inside the company and in other organisations housed in the airport that they coordinate. For the interviewees, evidence of an impact was any service or activity following H&S rules and guidelines.

'Impact is an activity or a service that needs to be provided according to specific H&S requirements.'

Safety Manager

'I agree, it is the need to tie activities and procedures to H&S rules.'

Operational Safety Manager

MM159/ER 214: Overall, how would you rate the degree of involvement of the line managers and supervisors in the management of health and safety? Is it very high, quite high, quite low or very low?

The safety manager reckoned the involvement was quite high. Due to the activities of the company and the technical background of most managers, levels of awareness regarding H&S were high.

10.6.2 Risk Assessment

MM161/ER207: Are workplaces in the establishment regularly checked for safety and health as part of a risk assessment or similar measures?

Yes both the safety manager and operational safety manager agreed that workplaces were regularly checked. These checks were carried out daily in the terminals and weekly or monthly in other areas.

MM162: Are these risk assessments or workplace checks mostly conducted by your own staff or are they normally contracted to external service providers?

There were no technical issues with this question. All checks were conducted by internal staff.

MM163: On which occasions are these risk assessments or workplace checks carried out? 01) Following a change in the staffing, layout or organisation of work; 02) At the request of employees eg in case of complaints; 03) At regular intervals, without any specific cause

There were no technical issues with this question. Workplace checks were performed every time there was a change in the organisation of work, when there was a request from employees and at regular intervals without specific causes. When asked about the meaning of 'work organisation' the safety manager mentioned the organisation of human resources and processes for specific activities.

'We do checks every time there is significant change to the way work is organised, such as the number of people needed to perform an activity, changes in the type of tasks, processes, machines used etc... For 'work organisation' I mean the way human resources, physical resources, processes and machines are all organised together to perform the activities.'

Safety Manager

MM164: Which of the following areas are routinely considered in these checks? 01) Equipment and working environment; 02) The way work is organised; 03) Irregular or long working hours; 04) Supervisor-employee relationships

Equipment and the working environment, the way work is organised, irregular or long working hours were all routinely considered in the checks. Whilst supervisor-employee relationships were not part of these checks, the safety manager does look into any issues about this pointed out by employees or managers.

MM166: And which of the following actions have been taken as a follow-up to these checks? 01) Changes to equipment or working environment; 02) Changes to the way work is organised; 03) Changes to working time arrangements; 04) Provision of training

The safety manager explained that changes to equipment or the working environment happened quite frequently. The establishment had also made changes to the way work was organised as a follow up to a check. Changes to working time arrangements were very rare, as working arrangements were quite rigid, although employees did interchange their shifts frequently. The safety manager also said that training was provided, although it later became clear that this was not a follow-up action to a check.

10.6.3 Levels of concern with occupational safety and health risks

MM200/ER250: For each of the following issues, please tell me whether it is of major concern, some concern, or no concern at all in your establishment? 01) Dangerous substances (eg dusts, chemical, biological); 02) Accidents; 03) Noise and vibration; 04) Musculoskeletal disorders; 05) Work-related stress; 06) Violence or threat of violence; 07) Bullying or harassment

01) Dangerous substances: both the safety manager and the operational safety manager explained that whilst these received great attention they were not a concern anymore because these risks were under control.

02) Accidents: these were not a concern at all due to the low incidence of accidents and the fact that the few that did occur were not linked to company activity. According to the operational safety manager, the type of accidents that would cause most worry were trips and accidents during commuting time potentially related to working long shifts.

03) Noise and vibration: neither of these were considered a concern. The operational safety manager explained that company workers were not based in areas with high levels of noise (eg close to aeroplanes) so this did not affect them. When required to enter a noisy areas there were specific procedures to follow so the risks were controlled.

04) Musculoskeletal disorders (MSDs): these were not a concern as workers were not involved in manual handling or movement of goods.

05) Work-related stress: this was not a concern because the risk assessment had not identified any issues linked to stress. However, the safety manager and operational safety manager both told how carrying out a stress risk assessment was complicated because the legislation did not define exactly what constitutes work-related stress or provide methodological instruments for measuring it. As such, they were still not sure whether they had assessed it accurately.

06) Violence or threat of violence, and 07) bullying or harassment were not a concern.

10.6.4 Drivers of and barriers to management of health and safety

MM171: In your establishment, how important are the following reasons for addressing health and safety? For each one, please tell me whether it is a major reason, a minor reason, or no reason at all. 01) Fulfilment of legal obligation; 02) Requests from employees or their representatives; 03) Staff retention and absence management; 04) Economic or performance-related reasons; 05) Requirements from clients or concern about the organisation's reputation; 06) Pressure from the labour inspector

Fulfilment of legal obligation and requests from employees were both major reasons for addressing H&S. Staff retention and absence management were

minor reasons, as the company did not have any issue with staff absence. Economic or performance-related reasons were considered minor reasons; the safety manager explained that if something needed to be done, there were no financial obstacles. Requirements from clients or concern about the organisation's reputation were not considered reasons at all. Pressure from the labour inspector, was considered to be a major reason for addressing H&S.

MM172: In your establishment, what are the main difficulties in dealing with health and safety? Please tell me for each of the following whether it is a major difficulty, a minor difficulty, or not a difficulty at all. 01) A lack of resources such as time, staff or money; 02) A lack of awareness; 03) A lack of expertise; 04) A lack of technical support or guidance; 05) The culture within the establishment; 06) The sensitivity of the issue

A lack of resources such as time, staff or money were a major difficulty for the safety manager because he had to set priorities. A lack of awareness, expertise, technical support or guidance were not considered difficulties at all. The culture within the establishment and the sensitivity of the issue were also not considered difficulties.

10.6.5 OSH and organisational performance

MM402: How would you rate the level of absenteeism in your establishment compared with other establishments in the sector? Is it very high, quite high, about average, quite low or very low?

The safety manager said he did not know the answer to this question as he did not have data on absenteeism in other establishments.

New Question: Compared to other organisations of your size and sector in Italy, how well would you say you perform in terms of health and safety outcomes such as the number of accidents and injuries at work, and the level of sickness absence?

The safety manager thought they were above average. However, he added that it was difficult to find comparable data.

MM403: How would you rate the current economic situation of this establishment? Is it very good, quite good, neither good nor bad, quite bad or very bad?

According to the safety manager the economic situation of the company was very good. He based his answer on internal reports he had seen on the company's economic performance.

New question: Compared to other organisations of your size and sector in Italy, how well would you say you perform in terms of business outcomes such as profit, turnover or other relevant measures of performance?

The safety manager believed that the situation of the company compared to others was very good. He based his answer on data publicly available in newspapers and on the internet about the economic performance of competitors.

11 Establishment Overview ID 113111

Note: The interview was carried out with the external safety manager, however at the end the owner of the company asked to join in. Although the appointment was made with both the safety manager and RLS and confirmed the day before, the RLS had to leave for personal reasons and it was not possible to make another appointment.

11.1 Establishment background

The company is a small laboratory that performs chemical and biological analysis on food, soil and the environment. A small unit of the company also offers occupational health services and medical surveillance to workplaces. The company has been operating since the early 1980s and comprises approximately 20 employees all with a regular permanent contract. Employees are all highly qualified with degrees and PhDs in engineering, chemistry, biology, medicine etc.

11.2 Respondent profiles

The management representative was the external RSPP (*Responsabile del servizio di prevenzione e protezione, Responsible for prevention and protection service*) and has worked at the company since 2010. His background is in environment and management and he has worked as external health and safety (H&S) consultant in a variety of sectors. He has the training required by the D.Lgs81/2008 at degree level to qualify as RSPP in different sectors.

No employee representative was interviewed for the reasons stated above.

11.3 Organisation of health and safety

The company is certified OHSAS 18001 which also forms the basis of its H&S system management. The organisation is also certified ISO14000, plus holds other specific quality system management certification.

The owner of the company is also the director with legal responsibilities in case of accidents. The company has an external RSPP who is responsible for ensuring compliance with the legislation and all activities related to the H&S management

system. The employee representative or RLS (*Rappresentate dei lavoratori per la sicurezza*, Workers Representative for health and safety) is also the person in charge of H&S inside the company.

11.4 Health and safety performance

The organisation did not provide the proforma.

11.5 Main technical issues

(issues with interpretation of questions, concepts and words; sensitivity of questions; problems in recall or reaching a judgment in answering)

MM159/ER 214: Overall, how would you rate the degree of involvement of the line managers and supervisors in the management of health and safety? Is it very high, quite high, quite low or very low?

The safety manager answered that the involvement was very high. He focussed his answer on the involvement of the owner/director of the company, probably because the Italian version of the question asks about 'direzione' and 'dirigenti' meaning 'directors'. In this small company the owner was also the director, but the interviewee mentioned other managers or supervisors only when specifically probed.

MM163: On which occasions are these risk assessments or workplace checks carried out? 01) Following a change in the staffing, layout or organisation of work; 02) At the request of employees eg in case of complaints; 03) At regular intervals, without any specific cause

The safety manager answered no to the last item, '*no at regular intervals, only those required by the statutory risk assessment*'. However, this is in contradiction with what was said in other parts of the interview when talking about H&S policy, processes and informal procedures inside the company. It seems that in the last item he focussed only on the word 'risk assessment' and thought about the statutory risk assessment rather than other types of checks.

MM200/ER250: For each of the following issues, please tell me whether it is of major concern, some concern, or no concern at all in your establishment? 01) Dangerous substances (eg dusts, chemical, biological); 02) Accidents; 03) Noise and vibration; 04) Musculoskeletal disorders; 05) Work-related stress; 06) Violence or threat of violence; 07) Bullying or harassment

This question brought about a number of issues related to the wording of the question and the length of the question. Another issue was the consistency of responses provided, as the concern or lack of it depended on a number of factors: the presence/absence of the risk, the management of the risk and the services

provided (ie there was great concern about dangerous substances because of the presence of the risk and great concern about work-related stress because the company provided health surveillance services). For dangerous substances and noise and vibration the safety manager immediately said these received 'great attention' rather than concerned him. When asked to explain the difference, he answered that concern was related to a lack of management of the risk while attention was about taking H&S issues into account and managing the risk properly.

'Concern for me is when you do not know the risk or you know that there is risk and you are not controlling it properly. Attention means that I know the risk related to an activity because I do the risk assessment and I manage it properly. I am thinking about all risks, if I focus more on one specific hazards overlooking the others the I would be concerned, attention is also about balance in the management of different risks.'

Safety Manager

MM171: In your establishment, how important are the following reasons for addressing health and safety? For each one, please tell me whether it is a major reason, a minor reason, or no reason at all. 01) Fulfilment of legal obligation; 02) Requests from employees or their representatives; 03) Staff retention and absence management; 04) Economic or performance-related reasons; 05) Requirements from clients or concern about the organisation's reputation; 06) Pressure from the labour inspector

The safety manager did not consider item 3 'staff retention and absence management' as relevant to the question. The underpinning reasons of absenteeism were believed to be more linked to HR issues than problems on H&S management.

'I don't think this is relevant to the question. In what sense staff retention and absence management should be a reason for addressing H&S issues? There are so many reasons before H&S that could lead to high levels of absenteeism that H&S I think is the last you have to look at.'

Safety Manager

The safety manager did not understand the meaning of the question for item 4 'economic or performance-related reasons', and asked for the question to be repeated several times.

'Economic reasons from whom? I do not understand what you mean with this question. If you mean whether financial resources are important obviously they are because without money you do not go far. But still I do not think this question is clear at all.'

Safety Manager

MM172: In your establishment, what are the main difficulties in dealing with health and safety? Please tell me for each of the following whether it is a major difficulty, a minor difficulty, or not a difficulty at all. 01) A lack of resources such as time, staff or money; 02) A lack of awareness; 03) A lack of expertise; 04) A lack of technical support or guidance; 05) The culture within the establishment; 06) The sensitivity of the issue

In this question there were two sets of issues. The first problem related whom the question referred. The safety manager asked whether the question was asking for his opinion or the company's. This might be linked to the fact that the safety manager was an external consultant, therefore he did not know these issues the same way an employee might. The other problem was the general meaning of the question, it was clear that the safety manager did not understand the question in the sense of barriers/difficulties but whether the identified areas were, in his opinion, important or not when dealing with H&S.

'For whom for me or for the company? [...] Do you mean if it is important for me in addressing H&S issues?'

Safety Manager

11.6 Summary of respondents' answers

11.6.1 Approach to management of health and safety

MM155/ER200: Is there a documented policy, established management system or action plan on health and safety in your establishment?'

There were no technical issues with this question. Yes the company is certified OHSAS 18001 and the H&S policy is based on this management system.

MM156/ER202: In practice, how much of an impact does this policy, management system or action plan have on health and safety in your establishment? Does it have a large impact, some impact, or practically no impact?

There were no technical issues with this question. The safety manager reckoned that the policy had a large impact because employees had clear and consistent guidelines to follow.

'For me an impact is when you have guidelines to follow that are valid for everyone and I see that employees act according to these rules. The policy has to change the behaviour of employees; this is the impact and the objective of the policy and system management.'

Safety Manager

MM159/ER 214: Overall, how would you rate the degree of involvement of the line managers and supervisors in the management of health and safety? Is it very high, quite high, quite low or very low?

The safety manager considered the involvement very high. He said that the owner/director of the company was very aware of H&S issues and wanted the highest possible standards. According to the safety manager this individual was also very engaging with the employees and constantly reminded them about H&S procedures and issues. As the owner worked in the company he performed daily informal checks on main H&S procedures such as fire doors, checking steps etc.

11.6.2 Risk Assessment

MM161/ER207: Are workplaces in the establishment regularly checked for safety and health as part of a risk assessment or similar measures?

There were no technical issues with this question. Yes the workplace is regularly checked. Within the policy framework there are monitoring processes covering all areas, these include routine checks at regular intervals but also the procedures required by the statutory risk assessment. The policy goes beyond legislative requirement for compulsory risk assessment.

MM162: Are these risk assessments or workplace checks mostly conducted by your own staff or are they normally contracted to external service providers?

There were no technical issues with this question. The risk assessment and checks are conducted by the safety manager, however all inspections are carried out together with the RLS and the owner. Because of the technical background and expertise of the RLS all subsequent changes and actions are decided with the RLS, who also supervises the implementation of these with the safety manager.

MM163: On which occasions are these risk assessments or workplace checks carried out?01) Following a change in the staffing, layout or organisation of work; 02) At the request of employees eg in case of complaints; 03) At regular intervals, without any specific cause

Risk assessments and checks are carried out mainly following a change in the staffing, layout or organisation of work. The safety manager said that they had never received a specific request from employees, but in case of requests or complaints the company would certainly proceed with a check. A risk assessment is also carried out at regular intervals according to statutory procedures.

MM164: Which of the following areas are routinely considered in these checks? 01) Equipment and working environment; 02) The way work is organised; 03) Irregular or long working hours; 04) Supervisor-employee relationships

There were no technical issues with this question. All areas are routinely considered in the checks. The safety manager explained that the policy takes into consideration equipment and the working environment (understood as physical space but also the social environment and relations between employees). The way work is organised includes the distribution of responsibilities across areas. Supervisor-employee relationships comprise mainly relations between employees and the owner, as the company has a very simple hierarchical structure.

MM166: And which of the following actions have been taken as a follow-up to these checks? 01) Changes to equipment or working environment; 02) Changes to the way work is organised; 03) Changes to working time arrangements; 04) Provision of training

There were no technical issues with this question. The safety manager said none of the actions had been taken as results of checks. The company had recently relocated to a completely new building and all equipment was new, therefore there was no need for changes. There had never been the need to change the way work is organised or working time arrangements as there is a very friendly and informal environment and employees have a high degree of freedom over the organisation of their work. Training had never been provided as a result of checks or a risk assessment but as part of HR or H&S management strategies.

11.6.3 Levels of concern with occupational safety and health risks

MM200/ER250: For each of the following issues, please tell me whether it is of major concern, some concern, or no concern at all in your establishment? 01) Dangerous substances (eg dusts, chemical, biological); 02) Accidents; 03) Noise and vibration; 04) Musculoskeletal disorders; 05) Work-related stress; 06) Violence or threat of violence; 07) Bullying or harassment

Dangerous substances were considered a major concern as these presented the main risks due the type of activities performed by the laboratory. Accidents were considered some concern; however the company had not had any accident for many years. Noise and vibration were a major concern because the company, a line of business of the company comprised providing external services of risk assessment on noise and vibrations, therefore in the workplace there were machines to perform tests on noise and vibrations. MSDs were labelled as some concern because the work comprises physical work/manual handling and repetitive tasks. Work-related stress within the company was labelled as some concern, as this risk had been recently assessed and no issues had been found. There was some concern about the threat of violence from external sources; while bullying or harassment was not a concern as the safety manager considered the

company a very informal and friendly work environment. The employee representative was not interviewed.

11.6.4 Drivers of and barriers to management of health and safety

MM171: In your establishment, how important are the following reasons for addressing health and safety? For each one, please tell me whether it is a major reason, a minor reason, or no reason at all. 01) Fulfilment of legal obligation; 02) Requests from employees or their representatives; 03) Staff retention and absence management; 04) Economic or performance-related reasons; 05) Requirements from clients or concern about the organisation's reputation; 06) Pressure from the labour inspector

The safety manager felt 'fulfilment of legal obligation' was a major reason because of the need to comply with the regulations. Requests from employees or their representatives were major reasons. In this case the safety manager referred to the technical expertise and responsibility that the RLS had within the company outside his role as employee representative, and how this gave him extra reason for taking any requests seriously. The safety manager did not consider staff retention and absence management applicable to this question and did not understand what was meant by 'economic or performance-related reasons'. Requirements from clients or concern about the organisation's reputation were a major driver; the company works with big international companies and clients have very high standards and specific requirements on H&S. Pressure from the labour inspector was a major reason on the same level as 'fulfilment of legal obligations'; the safety manager explained that not complying with the law was not an option in the company.

MM172: In your establishment, what are the main difficulties in dealing with health and safety? Please tell me for each of the following whether it is a major difficulty, a minor difficulty, or not a difficulty at all. 01) A lack of resources such as time, staff or money; 02) A lack of awareness; 03) A lack of expertise; 04) A lack of technical support or guidance; 05) The culture within the establishment; 06) The sensitivity of the issue

The safety manager said that all these areas were important for him when addressing H&S.

11.6.5 OSH and organisational performance

MM402: How would you rate the level of absenteeism in your establishment compared with other establishments in the sector? Is it very high, quite high, about average, quite low or very low?

There were no technical issues with this question. The safety manager regarded levels of absenteeism as very low. His judgement was based on his knowledge of the sector.

New question: Compared to other organisations of your size and sector in Italy, how well would you say you perform in terms of health and safety outcomes such as the number of accidents and injuries at work, and the level of sickness absence?’

There were no technical issues with this question. The safety manager stated that their H&S performance was better than average as the company had not had any accidents for many years.

MM403: How would you rate the current economic situation of this establishment? Is it very good, quite good, neither good nor bad, quite bad or very bad?

There were no technical issues with this question. The safety manager believed that the economic situation of the company was quite good. The reason for his answer was that the company worked with major suppliers in international markets and the company was in a phase of major growth and diversification of clients.

New question: Compared to other organisations of your size and sector in Italy, how well would you say you perform in terms of business outcomes such as profit, turnover or other relevant measures of performance?

There were no technical issues with this question. The safety manager believed the business performance was very good and gave the same reasons as for MM403.

12 Establishment Overview ID 121611

12.1 Establishment background

The company is a medium-sized company in the private sector with approximately 120 employees. The organisation produces and sells paint. The company operates in two sites. The main site is the headquarters, where the interview was held, and the majority of employees work. All employees have a regular permanent contract. In the summer, which is a peak time, the regular workforce is joined by five to ten agency workers.

The company is certified to ISO14000 and 2001.

12.2 Respondent profiles

The management representative interviewed was the RSPP (*Responsabile del servizio di prevenzione e protezione*, Responsible for prevention and protection service). He had been employed at the company for 30 years and his background was in chemical engineering. He was the director of the site, also responsible for health and safety (H&S), process management systems, quality assurance and environment protection.

The employee representative was the RLS (*Rappresentante dei lavoratori per la sicurezza*, Workers Representative for health and safety). He has worked at the company since 1980, with different roles all linked to production. He had been regularly elected as RLS by his colleagues.

12.3 Organisation of health and safety

The internal H&S organisation is very simple, with the RSPP (who is also the director of the site) responsible for all management and implementation of H&S, two RLSs and supervisors at the production line who are responsible for ensuring that H&S procedures are applied and check for possible issues.

12.4 Health and safety performance

The company did not provide a completed proforma.

12.5 Main technical issues

(issues with interpretation of questions, concepts and words; sensitivity of questions; problems in recall or reaching a judgment in answering)

MM155/ER200: 'Is there a documented policy, established management system or action plan on health and safety in your establishment?'

In this question the safety manager focussed solely on the wording 'documented policy' and told how the company does not have a certified policy on H&S. It might be useful to provide a brief description of what precisely is meant by 'documented policy'.

'No we do not have a certified policy on paper, but actually all our processes are based on procedures as we are going for certification.'

Safety Manager

In contrast, the RLS answered yes to the question. However, in his explanation he talked about the H&S procedures and their management system rather than a policy as such, including regular medical checks on employees, fire safety procedures, first aid procedures, the presence of fire extinguishers etc..

'Yes, we do have a policy on H&S, we have the doctors that monitor our health, we have fire extinguishers, employees' groups in charge of fire emergency procedures and first aid training.'

RLS

The company has clear H&S procedures and internal processes but nonetheless the safety manager and RLS provided inconsistent answers. It seems that the inclusion of multiple items in the question led to these different responses. The company has an established management system on H&S, which was the focus of the RLS's response and the reason why he answered yes but no documented policy, which is why the safety manager answered no.

MM200/ER250: 'For each of the following issues, please tell me whether it is of major concern, some concern, or no concern at all in your establishment?' 01) Dangerous substances (eg dusts, chemical, biological); 02) Accidents; 03) Noise and vibration; 04) Musculoskeletal disorders; 05) Work-related stress; 06) Violence or threat of violence; 07) Bullying or harassment

The safety manager asked to have the question repeated and asked about the meaning of 'concern' (*preoccupazione*). He explained that he would rather use the wording 'attention' (*attenzione*) instead of this.

'I'm not sure I like the word 'concern'. What do you mean? I would prefer to use the word 'attention'. In the sense that there is great attention in assessing our risks and managing them... but we are not concerned. 'Concerned' for me relates to lack of knowledge, whilst we spend time understanding and assessing our risks, therefore managing them as best as

possible. For this reason I'm not 'concerned' but I give to it great attention and consideration.'

Safety Manager

According to the RLS there is concern where a risk is not managed at all or not managed well.

'For me there is concern, when the company knows that there is risk and does not manage it or does not do what is needed to keep it controlled. If there is a risk, there is always concern but is less if this is managed. Prevention is crucial. In this case the company knows the risks and works on controlling them.'

RLS

MM163: 'On which occasions are these risk assessments or workplace checks carried out?' 01) Following a change in the staffing, layout or organisation of work; 02) At the request of employees eg in case of complaints; 03) At regular intervals, without any specific cause

For this question there was a technical issue concerning the difference between: a) a 'statutory risk assessment' required by the Italian legislation, and; b) a risk assessment intended as an assessment of a specific risk/piece of equipment; and, c) workplace checks. The safety manager focussed his answers only on occasions where the statutory risk assessment had been carried out. From information gathered during the interview it was clear that his answer did not provide a complete picture of what really happened in the company. For example, the safety manager said that a risk assessment was not carried out in the case of a change in staffing. However, from the interview, it was clear that workplace checks and thorough inductions were performed in the case of a new employee starting work or a change in tasks. The safety manager also said that a risk assessment had never been done in the case of requests or complaints from employees, whilst the RLS gave clear examples where risks had been assessed or reassessed following suggestions from employees (eg regarding problems with emergency exit doors or heavy objects).

MM166: 'And which of the following actions have been taken as a follow-up to these checks?' 01) Changes to equipment or working environment; 02) Changes to the way work is organised; 03) Changes to working time arrangements; 04) Provision of training

Initially the safety manager interpreted this question as asking about changes made following checks from labour inspectors and faults highlighted by the risk assessment. The interviewer was required to explain the actual purpose of the question.

ER102: 'Is there a permanent committee or working group consisting of members of the management and representatives of the employees dealing with safety and health in this establishment?'

The meaning of 'permanent committee' and 'working group' for the RLS was unclear

'In what sense? There is the statutory prevention and protection service which comprises the RSPP, RLS and the doctor. We also have the internal groups in charge of fire prevention, emergency evacuation and first aid procedures. But I'm not sure if this is what you mean.'

RLS

ER159: 'On which of the following issues have you or your health and safety representative colleagues received training?' 01) Fire safety; 02) Prevention of accidents; 03) Chemical, biological, radiation or dust hazards; 04) Ergonomics; 05) Violence, bullying or harassment; 06) Work-related stress; 07) Discrimination (for example due to age, gender, race or disability)

The RLS was unsure of the meaning of 'ergonomics'. After an explanation was provided he said he had received one training course focussed on this topic.

New question: 'Compared to other organisations of your size and sector in Italy, how well would you say you perform in terms of health and safety outcomes such as the number of accidents and injuries at work, and the level of sickness absence?'

The safety manager gave an answer to this but said it was his personal assessment rather than based on any objective data.

MM403: 'How would you rate the current economic situation of this establishment? Is it very good, quite good, neither good nor bad, quite bad or very bad?'

The safety manager thought this question was unclear. Specifically, he said he did not understand whether the question was asking for a judgement on absolute numbers or relative measure and which economic performance indicators he should use to make his judgement.

'What do you mean by 'economic situation'? If we manage to pay on time our employees, if there are high profits to reinvest? This question is not clear. If I compare to other companies we are better than others, but now it is not as good as it was in the past.'

Safety Manager

12.6 Summary of respondents' answers

12.6.1 Approach to management of health and safety

MM155/ER200: 'Is there a documented policy, established management system or action plan on health and safety in your establishment?'

The safety manager said the company did not have a certified policy, however all processes are based on H&S international standards as they are preparing for certification on quality, environment and safety. The RLS answered yes to the question and discussed the management system. He explained that the company has internal H&S procedures to ensure checks on employees' health (eg regular medical checks, fire safety procedures, emergency procedures and first aid).

MM156/ER202: 'In practice, how much of an impact does this policy, management system or action plan have on health and safety in your establishment? Does it have a large impact, some impact, or practically no impact?'

There were no technical issues with this question. The safety manager and the RLS believed the processes in place had had a large impact (although actually the safety manager should not have been asked this question as he said no to MM155). The safety manager based his judgement on decreasing levels of accidents and near misses since the implementation of their H&S procedures. Meanwhile, the RLS saw the implementation of compulsory procedures such as medical checks, PPE and respiratory protective equipment as the main evidence of impact. He could see that the company had invested in H&S and new equipment and machines were a tangible sign of impact.

'There is an impact if you have fewer accidents and fewer near misses, this is what is tangible and how you measure it in actual terms.'

Safety Manager

'Yes there is an impact because now we have clearer procedures to follow and employees cannot do what they want. There are regular medical checks for all workers, protective equipment, masks and special shoes provided by the company that employees have to wear all the time. The company has also changed and updated all machines, they invest on safety and are working constantly on improving the situation, this means that there is an impact'

RLS

MM159/ER 214: ‘Overall, how would you rate the degree of involvement of the line managers and supervisors in the management of health and safety? Is it very high, quite high, quite low or very low?’

There were no technical issues with this question. Both the safety manager and RLS rated the degree of involvement as quite high. The safety manager explained that in general there was a positive culture towards H&S and employees and managers were quite involved at all levels. The RLS immediately identified the safety manager as the main person to whom this question referred, and explained that he was knowledgeable and committed to keeping high H&S standards. After few probes he went on to discuss the involvement of line managers and supervisors and agreed that there was a committed H&S culture at all levels.

‘Yes there is a high level of involvement, the safety manager is very committed on his job and works very hard to improve the system, he is our point of reference... In general everybody cooperates to keep the work environment safe. Line managers are responsible for ensuring that all workers follow the rules, like wearing the protective equipment.’

RLS

12.6.2 Levels of concern with OSH risks

MM200/ER250: ‘For each of the following issues, please tell me whether it is of major concern, some concern, or no concern at all in your establishment?’ 01) Dangerous substances (eg dusts, chemical, biological); 02) Accidents; 03) Noise and vibration; 04) Musculoskeletal disorders; 05) Work-related stress; 06) Violence or threat of violence; 07) Bullying or harassment

The safety manager stated that dangerous substances received ‘great attention’ as these were the main source of risk in the establishment. The RLS labelled these as ‘some’ concern as the risks were well managed. Accidents were not a concern to either the safety manager or RLS because of the low level of accidents and near misses. Work-related stress it was of no concern to either the safety manager or RLS. The safety manager explained that the company had a very low turnover; the average job tenure for employees was around 20 years. Also the RLS believed that none of the employees showed signs of stress. Neither the safety manager nor RLS were concerned about the risks of violence, bullying or harassment, the reasons being that the establishment offered a very friendly work environment and colleagues were open-minded.

12.6.3 Risk Assessment

MM161/ER207: 'Are workplaces in the establishment regularly checked for safety and health as part of a risk assessment or similar measures?'

There were no technical issues with this question. Both the safety manager and RLS answered that yes, workplaces were regularly checked. The safety manager added that some employees were in charge of monitoring the workplace for H&S hazards every day and referring any possible issue to him. The safety manager explained that, although the statutory risk assessment document should be updated every two years, there were parts updated more frequently depending on their specific needs. The internal checks on workplace hazards went beyond the statutory risk assessment requirements and were carried out more frequently, either weekly or monthly.

MM162: 'Are these risk assessments or workplace checks mostly conducted by your own staff or are they normally contracted to external service providers?'

The statutory risk assessment was carried out by external consultants, whilst the workplace checks were performed by the safety manager and specifically trained employees.

MM163: 'On which occasions are these risk assessments or workplace checks carried out? '01) Following a change in the staffing, layout or organisation of work; 02) At the request of employees eg in case of complaints; 03) At regular intervals, without any specific cause

The risk assessment was carried out in cases of changes in the layout or organisation of work, but not when there was a change of staff, in this case new employees received OSH training. The safety manager said that no employee had ever made a request or complaint but if they did he would act immediately. No, the risk assessment was not carried out at regular intervals, without any specific cause.

MM164: 'Which of the following areas are routinely considered in these checks? '01) Equipment and working environment; 02) The way work is organised; 03) Irregular or long working hours; 04) Supervisor-employee relationships

There were no technical issues with this question. The safety manager said that equipment and working environment and the way work is organised were all considered in the risk assessment. Irregular or long working hours were not as the company's hours were from 9am to 4pm. Supervisor-employee relationships were not part of the risk assessment. The safety manager told how the work environment was friendly and informal and did not believe employees would not have any problems discussing OSH issues either directly with him or other managers.

MM166: 'And which of the following actions have been taken as a follow-up to these checks?' 01) Changes to equipment or working environment; 02) Changes to the way work is organised; 03) Changes to working time arrangements; 04) Provision of training

Changes to equipment or working environment had often been made as a follow-up to the risk assessment. There had been no changes to the way work is organised or to working time arrangements as there had never been a need. Additional training was usually provided every time there was a change in equipment and working environment, not necessarily related to a risk assessment.

ER209: 'Do you have a say in the decisions on when and where these risk assessments or workplace checks are carried out?'

There were no technical issues with this question. The RLS said yes, that employees and their representatives were very much involved in all decisions on risk assessments. The risk assessment had always been presented and explained to him and sometimes he had suggested changes or additional checks which had been carried out. In the past the RLS had pointed out issues with doors and the need for equipment to avoid manual handling. The company had reviewed the risk assessment for each area and replaced the doors and brought in new equipment for lifting boxes.

ER210: 'If the risk assessment or workplace check identifies a need for action: Is the necessary follow-up action taken?'

There were no technical issues with this question. The answer was yes and the RL mentioned the examples given in response to ER209 above. He also added that was normal procedure for employees to point out issues and suggest changes, either through the RLS or directly with the safety manager.

ER211: 'And are you as health and safety representatives usually involved in the choice of follow-up actions?'

There were no technical issues with this question. The RLS answered yes and told how the safety manager was very committed to explaining the risk assessment process to employees, its results and follow-up actions. The RLS was often involved in discussions with external contractors carrying out any changes. However, the RLS felt that he himself often lacked the technical expertise to make judgements or suggestions.

'Yes, I do not have the technical expertise but the safety manager always explains to everyone why things need to be done, how they will be done etc. I'm also involved with the external experts when they have to make changes or buy new equipment. When they did the risk assessment on noise and vibration I was there but even though they explained the process I do not

have the technical expertise to judge. But it is important to be involved anyway.'

RLS

12.6.4 Drivers of and barriers to management of health and safety

MM171: 'In your establishment, how important are the following reasons for addressing health and safety? For each one, please tell me whether it is a major reason, a minor reason, or no reason at all.' 01) Fulfilment of legal obligation; 02) Requests from employees or their representatives; 03) Staff retention and absence management; 04) Economic or performance-related reasons; 05) Requirements from clients or concern about the organisation's reputation; 06) Pressure from the labour inspector

There were no technical issues with this question. Fulfilment of legal obligation and requests from employees were considered major reasons for addressing H&S. Staff retention and absence management were not major reasons as both absenteeism and staff turnover were low. Economic or performance-related reasons were not a reason for addressing H&S. Requirements from clients or concern about the organisation's reputation were not reasons as they never received specific requirements from clients. Pressure from the labour inspector was not a reason as they never had any issues with inspections.

MM172: 'In your establishment, what are the main difficulties in dealing with health and safety? Please tell me for each of the following whether it is a major difficulty, a minor difficulty, or not a difficulty at all.' 01) A lack of resources such as time, staff or money; 02) A lack of awareness; 03) A lack of expertise; 04) A lack of technical support or guidance; 05) The culture within the establishment; 06) The sensitivity of the issue

There were no technical issues with this question. A lack of resources such as time, staff or money, was not considered a difficulty. That said, the safety manager thought a lack of time was sometimes an issue, mainly when implementing major changes, as he was the only one in charge of H&S. A lack of awareness, expertise, technical support and guidance were not considered difficulties. In general the culture within the establishment was not a problem. The sensitivity of the issue was considered a difficulty in the sense that H&S requires a thoughtful approach and has to be dealt with appropriately.

12.6.5 Worker participation and involvement

ER102: ‘Is there a permanent committee or working group consisting of members of the management and representatives of the employees dealing with safety and health in this establishment?’

The RLS he did not provide an answer to this as he was not sure about the meaning of the question (see technical section for more details).

ER107: ‘How often do controversies related to safety and health arise between the management and the employee representatives? Is this often, sometimes, or practically never the case?’

There were no technical issues with this question. The RLS said it was never the case as he was very much involved in all H&S decisions since the safety manager made a point about asking employees for their opinion. The RLS saw ‘controversies’ as disagreements between the company and employees on whether a possible hazard needed to be assessed and what actions were needed to control the risk.

‘Controversies are when for example, if employees say that there is a problem somewhere and the company does check or when the company says this is what I am going to do for this hazards and employees think that is not enough or not appropriate, this is a controversy.’

RLS

ER205: ‘Are employees in this establishment regularly informed about safety and health in the workplace?’

There were no technical issues with this question. The RLS said that yes, there was a constant flow of information between the safety manager and employees, through meetings and informal chats directly with employees or through the RLS and union rep.

ER215_05: ‘Please tell me whether you agree (1), neither agree nor disagree (2), or disagree (3) with the following statement: ‘Our management gives proper consideration to occupational safety and health issues raised by employee or their representatives’’

There were no technical issues with this question. The RLS agreed with the statement. According to him the company always gave the right attention to employees’ needs and observations.

‘Proper consideration is when the company takes into account what employees say and their problems.’

RLS

12.6.6 OSH resources and training

ER150: ‘Do you as the employee representative for safety and health usually get sufficient time off from normal duties to perform these tasks adequately?’

There were no technical issues with this question. Yes, the interviewee thought that RLSs were given sufficient time to dedicate to H&S tasks.

ER154: ‘Does the management provide you with the necessary information for carrying out your health and safety tasks properly?’

There were no technical issues with this question. The RLS stated that yes, they had all the information and training they needed to carry out their tasks. He mentioned that RLSs received regular training every year to update them on new legislation and H&S procedures.

ER155: ‘Do you usually receive information on time and without having to ask for it?’

There were no technical issues with this question. Yes, there was constant collaboration between the RLSs and the Safety manager.

ER159: ‘On which of the following issues have you or your health and safety representative colleagues received training?’ 1) Fire safety; 02) Prevention of accidents; 03) Chemical, biological, radiation or dust hazards; 04) Ergonomics; 05) Violence, bullying or harassment; 06) Work-related stress; 07) Discrimination (for example due to age, gender, race or disability)

The RLS said he received training on all items presented in the question and that RLSs were sent on training courses every year.

ER160: ‘Is this training sufficient or would more training in any of these fields be desirable?’

There were no technical issues with this question. The training was considered sufficient to deal with the responsibilities of his role as an RLS.

12.6.7 OSH and organisational performance

MM402: ‘How would you rate the level of absenteeism in your establishment compared with other establishments in the sector? Is it very high, quite high, about average, quite low or very low?’

There were no technical issues with this question. Levels of absenteeism were believed to be average. The safety manager based his judgement on informal chats he had had with other safety managers in the same sector.

New Question: ‘Compared to other organisations of your size and sector in Italy, how well would you say you perform in terms of health and safety outcomes such as the number of accidents and injuries at work, and the level of sickness absence?’

The safety manager believed that the organisation’s performance was average but did not have objective data on which to base his answer.

MM403: ‘How would you rate the current economic situation of this establishment? Is it very good, quite good, neither good nor bad, quite bad or very bad?’

The safety manager did not provide an answer, as he believed the question was not clear.

New question: ‘Compared to other organisations of your size and sector in Italy, how well would you say you perform in terms of business outcomes such as profit, turnover or other relevant measures of performance?’

The safety manager believed that the business performance of the company compared to other companies was quite good.

13 Establishment Overview ID 132211

13.1 Establishment background

The company is a medium-sized establishment with 115 employees. It was started in Italy in 1956 and was bought by a multinational pharmaceutical group approximately ten years ago. The company produces drugs for animals, specialising in antibiotics. The main risk for staff is development of allergies and resistance to antibiotics.

Half of the employees work in the production area and half in administration and marketing. All 115 employees have a regular permanent contract, however during peak times the company takes on approximately ten to 15 agency workers.

13.2 Respondent profiles

The management representative is the RSPP (*Responsabile del servizio di prevenzione e protezione, Responsible for prevention and protection service*) or safety manager and has been working at the company for more than 30 years. His background is in chemistry and he started at the company with responsibility for quality control management. He has been RSPP since 1999, when the company was bought by the multinational group. He was considered the best candidate for the post as had previously held the role of RLS (*Rapresentante dei lavoratori per la sicurezza, Workers' representative on health and safety*) and had extensive knowledge of health and safety (H&S) and management systems.

The employees' representative is the RLS. He has worked for the company since 2002, on the production side. He was elected RLS two years ago and is also the union rep.

13.3 Organisation of health and safety

The organisation of H&S in the establishment is rather simple and is integrated within other organisational systems. The RSPP is responsible for implementation and oversees all of the safety management system and ensures compliance with the legislation. All line managers have been appointed with some responsibilities for monitoring and ensuring compliance to H&S internal procedures (eg auditing,

checks, training assessments etc). There also two RLSs regularly elected by their colleagues.

13.4 Health and safety performance

The company did not provide a completed proforma.

13.5 Main technical issues

(issues with interpretation of questions, concepts and words; sensitivity of questions; problems in recall or reaching a judgment in answering)

MM155/ER200: Is there a documented policy, established management system or action plan on health and safety in your establishment?’

The RLS asked whether the question referred to documented procedures in place.

‘Do you mean if there are documented procedures in the company?’

RLS

MM156/ER202: In practice, how much of an impact does this policy, management system or action plan have on health and safety in your establishment? Does it have a large impact, some impact, or practically no impact?

The RLS specified that he understood this question as referring to ‘positive impact’.

‘If for large impact you mean positive then yes there is a large impact.’

RLS

MM162: Are these risk assessments or workplace checks mostly conducted by your own staff or are they normally contracted to external service providers?

The safety manager thought this question should have multiple response options as the auditing is carried out entirely by internal staff whilst some measurements of risk are contracted to external companies.

ER102: Is there a permanent committee or working group consisting of members of the management and representatives of the employees dealing with safety and health in this establishment?

The interviewee asked what was meant by ‘permanent committee’.

‘What do you mean for permanent committee, if you mean groups that work on specific H&S projects yes. There are some groups with managers and technicians that are permanent. At the beginning these groups were very

active and made great improvements in the company, with new ideas and lots of things have been implemented; now less because the system is quite good.'

RLS

MM402: How would you rate the level of absenteeism in your establishment compared with other establishments in the sector? Is it very high, quite high, about average, quite low or very low?

The safety manager thought this question should be preceded by two other questions: a) whether there is a monitoring system in the company; and b) how absenteeism is measured.

'This question is not appropriate in the sense that first you should ask whether people monitor absence and secondly how do they measure it, what do they include.'

Safety Manager

13.6 Summary of respondents' answers

13.6.1 Approach to management of health and safety

MM155/ER200: Is there a documented policy, established management system or action plan on health and safety in your establishment?'

Yes. The safety manager explained that the company has an internal policy based on OHSAS 18001 but is not certified. The company hold the ISO14000 environmental certificate and its internal health and safety policy is based on ISO certification. The RLS referred to the internal system of procedures on safety behaviour, emergency procedures, medical visits, monitoring, use of signs and training.

MM156/ER202: In practice, how much of an impact does this policy, management system or action plan have on health and safety in your establishment? Does it have a large impact, some impact, or practically no impact?

Both the safety manager and RLS felt that the policy had a large impact on the establishment's performance and employees. The safety manager referred to the staff bonus system, monitoring of absence and its achievement of its 'zero accident' objective. The productivity bonuses for all employees are based on a number of criteria and objectives to be met by the organisation; H&S is one of the criteria and accounts for 25 per cent of the score. For example, if there is an accident caused by a fault in the H&S system at any level this impacts on the bonus. As such all employees are committed to maintaining good standards and

improving OSH. The policy includes a strict monitoring system of staff absence and its causes, so that they can identify any potential areas of concern.

'The monitoring system of absenteeism had a significant impact on organisation performance. If someone is off sick because of flu, this is not because of the work I know, but I monitor it because an unhealthy work environment means more absenteeism and less productivity. If someone takes a day because of childcare problems, this is fine but if this happens often I need to understand what can be done to manage this situation.'

Safety Manager

The RLS felt that the procedures had a large impact as the company had not had accidents for many years and near misses were almost nil.

'Impact for me is when in the company safety procedures are in place and respected by all employees, this is impact for me.'

RLS

MM159/ER 214: Overall, how would you rate the degree of involvement of the line managers and supervisors in the management of health and safety? Is it very high, quite high, quite low or very low?

There were no technical issues with this question. Both the safety manager and RLS believed the involvement of line managers and supervisors was very high. The safety manager referred to active involvement of managers and employees in H&S activities, this included controlling and monitoring workers and workplaces, awareness-raising activities with employees, suggestions and co-operation in improving the work environment and internal training programmes. Likewise, the RLS believed all managers and employees were actively involved in keeping the workplace safe and had high levels of awareness on H&S issues.

'I want everyone to be actively involved in H&S activities and being proactive, this ensure commitment towards better work environment and high standards.'

Safety Manager

13.6.2 Levels of concern with OSH risks

MM200/ER250: For each of the following issues, please tell me whether it is of major concern, some concern, or no concern at all in your establishment? 01) Dangerous substances (eg dusts, chemical, biological); 02) Accidents; 03) Noise and vibration; 04) Musculoskeletal disorders; 05) Work-related stress; 06) Violence or threat of violence; 07) Bullying or harassment

There were no technical issues with this question.

01) Dangerous substances: these was of some concern to the safety manager and no concern to the RLS. The safety manager discussed the management of risks in

a clinical environment producing pharmaceuticals and the associated problems of allergies and antibiotic resistance.

'Development of allergies and antibiotic resistance are the main areas of concern, in the sense that this is the priority area to manage from an H&S perspective. There is some concern, because although we manage it in the best possible way, there is always a possibility to develop allergies or resistance. But for me this is a positive concern in the sense that there is a high level of attention, awareness and control on this area.'

Safety Manager

02) Accidents: these were not a concern for either interviewee largely because the system in place has brought the levels of accidents and near misses to zero.

03) Noise and vibration were of no concern to either the safety manager and RLS, because of the absence of these type of risks.

04) Musculoskeletal disorders (MSDs): these were not a concern for either the safety manager or RLS. According to the safety manager risks to this were well managed. He explained that all equipment had been changed to avoid manual handling of heavy weights and unsafe positions that could strain backs or force workers to conduct repetitive tasks. The RLS also believed that this risk was totally under control and that all employees were well trained to avoid any type of movement that could cause injuries.

05) Work-related stress: this was of little concern to either the safety manager or RLS mainly because a risk assessment on this had come back with positive results. According to the safety manager the company has a strict risk assessment procedure on stress, carried out specifically for different areas and job profiles. The last risk assessment highlighted a higher level than in the previous year but this was still quite low, and the reasons for this were linked to the general economic crisis rather than a stressful work environment.

06) Violence and bullying were not a concern at all for either interviewee. The safety manager said that the work environment was friendly and informal.

The RLS explained that he was not concerned in general because all risks were well managed.

'Concern for me is when there is a risk that is not managed. It's not that we do not have risks but here everything is under control. There are constant checks and monitoring, also everyone knows that if there is an issue they have to report it immediately or if we think something could be managed better we discuss it with the Safety manager.'

RLS

13.6.3 Risk Assessment

MM161/ER207: Are workplaces in the establishment regularly checked for safety and health as part of a risk assessment or similar measures?

There were no issues with this question. Both the safety manager and RLS answered yes. The company has a standardised programme of internal audits, with a randomised schedule of checks that cover all work areas of work at least twice per year. The safety manager explained that their auditing system goes beyond the checks required by the statutory risk assessment. The legislation requires an update of the risk assessment document any time there is a significant change, while the company reviews the document once per year even without a specific reason.

For the safety manager 'regularly' meant '*scheduled, planned at given periods of time.*'

MM162: Are these risk assessments or workplace checks mostly conducted by your own staff or are they normally contracted to external service providers?

The auditing checks are carried out entirely by internal staff. The legal risk assessment document is largely reviewed by the safety manager except for some parts which need to be checked by an external expert.

MM163: On which occasions are these risk assessments or workplace checks carried out?01) Following a change in the staffing, layout or organisation of work; 02) At the request of employees eg in case of complaints; 03) At regular intervals, without any specific cause.

There were no technical issues with this question. The safety manager stated that workplace checks were performed in all situations listed by the question. Any changes to staffing or the organisation of work are followed by a reassessment of the risk. As for requests from employees, all employees are responsible for constantly monitoring and reporting possible issues. There is also a notice board in the establishment where employees can leave anonymous messages on possible H&S issues. The auditing system includes randomised checks without any specific causes.

For the safety manager 'work organisation' meant all activities needed to produce something, including production activities, the management of human resources, H&S procedures etc.

'Work organisation includes all activities and systems that you need to put in place to arrive at the final product. These are production activities, H&S rules, human resources and management of them, all these systems together are the work organisation.'

Safety Manager

MM164: Which of the following areas are routinely considered in these checks? 01) Equipment and working environment; 02) The way work is organised; 03) Irregular or long working hours; 04) Supervisor-employee relationships

There were no technical issues with this question. The areas routinely checked were equipment and the working environment and the organisation of work. Irregular working hours were not part of routine checks as employees worked on two daily shift patterns and it was very rare for them to be asked to do extra hours or work nights. Supervisor-employee relationships were not formally included in the auditing checks. However, the safety manager believed that these issues would be discussed and that employees would have no problems raising issues with him.

MM166: And which of the following actions have been taken as a follow-up to these checks? 01) Changes to equipment or working environment; 02) Changes to the way work is organised; 03) Changes to working time arrangements; 04) Provision of training

There were no technical issues with this question. Follow-up actions had been taken mostly to introduce changes to equipment or the working environment. Changes to the way work was organised and changes to working time arrangements had been made but not as consequence of checks. The safety manager gave the example of rare occasions where they had to work over night, for which he had to adjust shift patterns to avoid lone working and to ensure the presence of workers trained in first aid and emergency procedures at all times. Provision of training had never been a consequence of checks but they have an action plan on OSH training with scheduled training courses for different work areas and job profiles.

'The training is something systematically organised, we always have training on different areas of H&S.'

Safety Manager

ER209: Do you have a say in the decisions on when and where these risk assessments or workplace checks are carried out?

There were no technical issues with this question. Yes, the RLS was often present during the auditing and was always actively involved in major changes. The RLS stressed during the interview that the safety manager was collaborative and encouraged employees to be proactive in making suggestions.

ER210: If the risk assessment or workplace check identifies a need for action: Is the necessary follow-up action taken?

There were no technical issues with this question. The RLS said that when a need for action was identified by the checks the safety manager always acted within a well-defined time period and set clear priorities.

ER211: And are you as health and safety representatives usually involved in the choice of follow-up actions?

There were no technical issues with this question. The RLS said he was always present during the risk assessment or checks and always involved in the following process if changes were needed.

'It never happens that employees know after something is done, I'm always involved through the process and decisions are made together.'

RLS

13.6.4 Drivers of and barriers to management of health and safety

MM171: In your establishment, how important are the following reasons for addressing health and safety? For each one, please tell me whether it is a major reason, a minor reason, or no reason at all.' 01) Fulfilment of legal obligation; 02) Requests from employees or their representatives; 03) Staff retention and absence management; 04) Economic or performance-related reasons; 05) Requirements from clients or concern about the organisation's reputation; 06) Pressure from the labour inspector

There were no technical issues with this question. The safety manager identified all areas as major reasons for addressing H&S, except for pressure from the labour inspector which only a minor reason as they had never had any issues with inspections. Absence management was a major reason as high levels of absenteeism would impact on the productivity of the company. Economic reasons were a major driver because a healthy workforce and standardized H&S procedures have a positive impact on productivity. Requirements from clients and the organisation's reputation were as major reasons as the company was part of an international group and it was a priority to meet the high standards of the group.

MM172: In your establishment, what are the main difficulties in dealing with health and safety? Please tell me for each of the following whether it is a major difficulty, a minor difficulty, or not a difficulty at all.’ 01) A lack of resources such as time, staff or money; 02) A lack of awareness; 03) A lack of expertise; 04) A lack of technical support or guidance; 05) The culture within the establishment; 06) The sensitivity of the issue

There were no technical issues with this question. None of the areas identified by the questions were considered a difficulty in dealing with H&S. Lack of resources was not a problem as the company was part of a large multinational group that invested significantly in H&S. Lack of awareness, expertise, technical support and the culture within the organisation were not an issue mainly because there was strong collaboration from all employees. The safety manager gave the example of a specific initiative (called the ‘safety corner project’) encouraging employees to make suggestions and ideas on how to improve the work environment and introduce changes. All suggestions were reviewed every month, and every year there was a prize for the best idea.

13.6.5 Worker participation and involvement

ER102: Is there a permanent committee or working group consisting of members of the management and representatives of the employees dealing with safety and health in this establishment?

The RLS said that there were various specific projects in the company to improve the H&S system which included permanent groups comprised of managers and the technicians in charge. The RLS also mentioned the ‘safety corner’ project and said that both managers and technicians were involved in evaluating the suggestions.

ER107: How often do controversies related to safety and health arise between the management and the employee representatives? Is this often, sometimes, or practically never the case?’

There were no technical issues with this question. The RLS answered practically never.

‘No never. There is involvement of workers at 360 degrees, in everything and it never happened that we had unresolved issues.’

RLS

ER205 : Are employees in this establishment regularly informed about safety and health in the workplace?

There were no technical issues with this question. Yes employees are regularly informed. The RLS referred to regular meetings between the safety manager and

employees, an intranet where all employees can access H&S documents and procedures, information boards with all the results of risk assessments and info on H&S projects. There are also screens around the site showing videos on H&S procedures and legislations.

ER215_05: Please tell me whether you agree (1), neither agree nor disagree (2), or disagree (3) with the following statement: 'Our management gives proper consideration to occupational safety and health issues raised by employee or their representatives'.

There were no issues with this question. The RLS agreed with the statement.

13.6.6 OSH resources and training

ER150: Do you as the employee representative for safety and health usually get sufficient time off from normal duties to perform these tasks adequately?

There were no technical issues with this question. The RLS answered yes, and said he is given all the time he needs to perform his OSH tasks.

ER154: Does the management provide you with the necessary information for carrying out your health and safety tasks properly?

There were no technical issues with this question. The RLS answered yes, and referred to training courses, information procedures and constant collaboration between himself and the safety manager.

ER155: Do you usually receive information on time and without having to ask for it?

There were no technical issues with this question. The RLS answered yes, and said he gave the same reasons as above.

ER159: On which of the following issues have you or your health and safety representative colleagues received training? 01) Fire safety; 02) Prevention of accidents; 03) Chemical, biological, radiation or dust hazards; 04) Ergonomics; 05) Violence, bullying or harassment; 06) Work-related stress; 07) Discrimination (for example due to age, gender, race or disability)

There were no technical issues with this question. The RLS had received training on all areas listed in the question, except for violence and discrimination, for which he had received information from the safety manager.

ER160: Is this training sufficient or would more training in any of these fields be desirable?

There were no technical issues with this question. The RLS believed his training was sufficient to perform his role.

13.6.7 OSH and organisational performance

MM402: How would you rate the level of absenteeism in your establishment compared with other establishments in the sector? Is it very high, quite high, about average, quite low or very low?

The safety manager believed the level of absenteeism was very low. His answer was based on longitudinal data within the group, and data on pharmaceutical companies.

New question: Compared to other organisations of your size and sector in Italy, how well would you say you perform in terms of health and safety outcomes such as the number of accidents and injuries at work, and the level of sickness absence?'

There were no technical issues with this question. The safety manager believed the establishment performed better than average. His response was based on comparisons with official data found on the internet.

MM403: How would you rate the current economic situation of this establishment? Is it very good, quite good, neither good nor bad, quite bad or very bad?

There were no technical issues with this question. The safety manager believed the current economic situation was quite good, although the economic crisis had impacted on this.

New question: Compared to other organisations of your size and sector in Italy, how well would you say you perform in terms of business outcomes such as profit, turnover or other relevant measures of performance?

There were no technical issues with this question. The safety manager believed the company performed very well compared to other organisations in Italy.

14 Establishment Overview ID 142311

14.1 Establishment background

Establishment is a large organisation, part of a multinational group, with four sites in Italy. The company operates in the food industry sector producing confectionary. The interview was held at the administrative headquarters and the main production factory. Approximately 100 employees work at the factory, all with regular permanent contracts. During peak times the company employs 50 to 60 extra seasonal agency workers. The administrative headquarters employs around 50 people in human resources, marketing and administration.

14.2 Respondent profiles

The management representative is the director of the factory; he has worked at the company since 2000. He started as supervisor, before becoming as director of other sites. He has been director of the main factory since 2007.

The RLS (*Rappresentante dei lavoratori per la sicurezza*, Workers' representative on health and safety) has worked at the company since 1981. He started at the production line and now manages the maintenance of machines. He has been an RLS for six years and is also union rep, regularly elected by his colleagues.

14.3 Organisation of health and safety

The director interviewed is responsible for the implementation of and compliance with the health and safety (H&S) system at the site. There are three RLSs who are also union representatives, regularly elected by their colleagues. The line managers at the site are responsible for ensuring compliance with internal H&S procedures. The RSPP (*Responsabile del sistema di prevenzione e protezione*, Responsible for prevention and protection service) is an external consultant, who is also the RSPP for their other sites in Italy.

The company has international guidelines at a group level and the establishment's H&S strategy is framed within these international parameters.

14.4 Health and safety performance

The company did not provide the proforma.

14.5 Main technical issues

(issues with interpretation of questions, concepts and words; sensitivity of questions; problems in recall or reaching a judgment in answering)

MM162: Are these risk assessments or workplace checks mostly conducted by your own staff or are they normally contracted to external service providers?

The safety manager explained that there were several levels of checks and responsibilities: a) auditing, part of the internal company policy, was performed by an organisation that was external to the company but internal to the group; b) the monthly checks on emergency exits, fire doors, emergency procedures etc. carried out by internal managers, and; c) the risk assessments performed by internal employees but also external experts where required (eg for testing noise levels, fire extinguishers, etc.).

'Here you open a door on a complex world. Is more complicated that the options you gave me, according to the level of expertise needed, purposes or measurements it can be done by internal or external experts.'

Safety Manager

MM171: In your establishment, how important are the following reasons for addressing health and safety? For each one, please tell me whether it is a major reason, a minor reason, or no reason at all.' 01) Fulfilment of legal obligation; 02) Requests from employees or their representatives; 03) Staff retention and absence management; 04) Economic or performance-related reasons; 05) Requirements from clients or concern about the organisation's reputation; 06) Pressure from the labour inspector

According to the safety manager the purpose and meaning of item 4 'economic reasons' was unclear. He pointed out that the question should clarify whether it refers to budget constraints or the impact of H&S on productivity.

'What do you mean for' economic reasons'? If you mean in the sense that the company does or doesn't make changes according to the budget, no this is not a reason. If you mean in the sense that improving your H&S system you increase the productivity therefore there is an economic return, yes. It is important although it not a priority.'

Safety Manager

Another issue in this question related to item 5 'requirements from clients or concern about the organisation's reputation'. For the safety manager requirement from clients was not a reason at all; but the organisation's reputation was a priority at a group level, so this was a major reason for addressing health and safety.

Pressure from the labour inspector was not ‘pressure’ in the sense that they had been visited and told to make changes. This item was interpreted in a similar way to item 1, as about a need to comply with the legislative framework.

MM402: How would you rate the level of absenteeism in your establishment compared with other establishments in the sector? Is it very high, quite high, about average, quite low or very low?

New question: Compared to other organisations of your size and sector in Italy, how well would you say you perform in terms of health and safety outcomes such as the number of accidents and injuries at work, and the level of sickness absence?’

MM403: How would you rate the current economic situation of this establishment? Is it very good, quite good, neither good nor bad, quite bad or very bad?

In answering the above three questions, the safety manager compared the performance of their site with other sites in the company. He did not always consider establishments external to the organisation.

14.6 Summary of respondents’ answers

14.6.1 Approach to management of health and safety

MM155/ER200: Is there a documented policy, established management system or action plan on health and safety in your establishment?’

There were no technical issues with this question. Both answered yes and referred to a policy and management system based on OHSAS 18001 (Occupation Health and Safety Assessment Series) (the company has been certified since 2010). The safety manager also explained that they have a H&S plan with objectives and actions that adhere to those of the organisation as a whole and provided the example of objectives on accidents, training and auditing embedded in the policy. In describing the policy, the RLS referred to H&S procedures on safety behaviours and routine checks carried out at the workplace.

MM156/ER202: In practice, how much of an impact does this policy, management system or action plan have on health and safety in your establishment? Does it have a large impact, some impact, or practically no impact?

The safety manager believed that the impact was large and referred to a significant reduction in accidents and near misses in the factory.

‘Impact is the consequence of an action, the reduction of accidents and near misses over the years is the clear impact of these processes in the

company. If you have only one accident obviously this is an impact. Our objective is zero though.'

Safety Manager

The RLS thought there was some impact, largely because the company did not have a high risk profile, the risks were well managed and there was a low level of accidents. His definition of impact related to the commitment of the company towards H&S which it expressed through clear procedures, training, attention to compliance to safety rules and consideration of employees' suggestions and complaints.

'There is some impact, but you have to consider that the H&S here is at high standards and there are not big risks. The risks are all well managed, we have procedures, basically no accidents and everyone knows that there are rules to follow. Impact is for me also what the company really does, not only what is on paper. For example when we have temporary agency workers there is a thorough induction and specific training on safety behaviour and procedures.'

RLS

MM159/ER 214: Overall, how would you rate the degree of involvement of the line managers and supervisors in the management of health and safety? Is it very high, quite high, quite low or very low?

There were no technical issues with this question. Both the safety manager and RLS believed the degree of involvement was quite high. Both referred to the cooperative attitude of managers concerning OSH issues that need addressing. The RLS also mentioned the attention given by managers to ensure that workers follow safety procedures. He pointed out that the involvement of line managers was also driven by the company, specifically the safety manager, as he allocated clear H&S responsibilities to both supervisors and managers. The safety manager specified that involvement was only 'quite high' rather than 'very high' because H&S is not managers' first priority.

'I would say quite high, in the sense that when I ask something I have their full cooperation. I can't say very high as they also have other priorities, but there is definitely commitment.'

Safety Manager

'There is attention, all managers and supervisors make sure that workers follow safety behaviour, but also they look to see whether there are issues in the workplace and refer to the safety manager. In general they are all very much involved, we cannot say that they do not care. But it is also the company, in the sense that the safety manager makes sure that there is always a supervisor or manager in charge of H&S, with clear responsibilities and procedures to follow if something happens.'

RLS

14.6.2 Levels of concern with OSH risks

MM200/ER250: For each of the following issues, please tell me whether it is of major concern, some concern, or no concern at all in your establishment? 01) Dangerous substances (eg dusts, chemical, biological); 02) Accidents; 03) Noise and vibration; 04) Musculoskeletal disorders; 05) Work-related stress; 06) Violence or threat of violence; 07) Bullying or harassment

There were no technical issues with this question.

01) Dangerous substances: both the RLS and the safety manager believed that dangerous substances were no concern at all because these were not present.

02) Accidents: these were an area of high concern for the safety manager. He referred to the likelihood of an accident happening regardless of how well it was managed; their priority was for these to be at a low level. The RLS said accidents were some concern, for the same reasons.

'Yes, this is an area of high concern, there is always a certain level of probability even if you manage the risks, and this is also part of our objectives.'

Safety Manager

03) Noise and vibration: these were of some concern to both interviewees. Inside the factory there was an area with high levels of noise and, although safe procedures were in place (eg. short shifts and protective equipment) the company was looking at how to improve the management of this risk.

'There is some concern as we have areas with high noise, we have procedures in place but are also looking into this with a specialised company to see what needs to be done to improve the management of this risk. Here there is definitively room for improvement.'

Safety Manager

04) Musculoskeletal disorder (MSDs): these were of some concern to the safety manager and no concern to the RLS. The safety manager referred to repetitive movements on the production line, but the risk was limited to a couple of months per year during peak season. To avoid strain to the muscles workers rotate job roles every half-an-hour. The RLS referred to heavy weights in the warehouse, but said that these were no concern at all as the risks were under control and well managed.

05) Work-related stress: neither the safety manager nor the RLS were concerned about this. They both explained that this was a new area and that they had just started to assess the risks. The RLS did not think stress was an issue as he had never heard any workers complain about it.

06) Violence and 07) bullying: these were not a concern. The safety manager and RLS said there had no reports of incidents and defined the work environment as 'healthy and quiet'.

14.6.3 Approach to risk assessments

MM161/ER207: Are workplaces in the establishment regularly checked for safety and health as part of a risk assessment or similar measures?

There were no technical issues with this question. The safety manager and RLS both answered yes and referred to external audits as part of their H&S policy procedures, as well as monthly checks on fire doors, steps, emergency exits etc. Additionally, the safety manager added that they conducted a new risk assessment every time there was a change (eg new machine, change of tasks etc) and additional checks were carried out at the request of the RLS. His definition of 'regularly' related to: a) scheduled checks, b) checks in case of changes; and, c) a prompt response to employees' requirements.

'Regularly for me means twice per year, plus a risk assessment every time there is a change and every time there is a requirement from the RLS.'

Safety Manager

MM162: Are these risk assessments or workplace checks mostly conducted by your own staff or are they normally contracted to external service providers?

The safety manager explained that routine checks were carried out by internal staff, that the audits was performed by an organisation working at a group level, while specialised risk assessments were carried out by both internal staff and external experts.

MM163: On which occasions are these risk assessments or workplace checks carried out? 01) Following a change in the staffing, layout or organisation of work; 02) At the request of employees eg in case of complaints; 03) At regular intervals, without any specific cause

There were no technical issues with this question. Risk assessment or work place checks were carried out in all cases identified by the question. The safety manager referred to internal procedures encouraging employees to act proactively towards risk checks (such as the 'tag project', a register where employees could write issues and requirements on safety).

'We have a book where employees write their requirements or if they are concerned about something, we evaluate this request one per month. As a result of this there is always a check which can be followed by more significant risk assessment or actions if needed.'

Safety Manager

MM164: Which of the following areas are routinely considered in these checks? 01) Equipment and working environment; 02) The way work is organised; 03) Irregular or long working hours; 04) Supervisor-employee relationships

There were no technical issues with this question. Equipment and the working environment were routinely checked. The way work is organised was included only in case of changes. The safety manager gave the example of repetitive tasks on the production line which had led to an assessment of the way work was organised. Irregular or long working hours were not routinely checked during the year, only during peak seasons. Supervisor-employee relationships were checked by the director of the site.

MM166: And which of the following actions have been taken as a follow-up to these checks? 01) Changes to equipment or working environment; 02) Changes to the way work is organised; 03) Changes to working time arrangements; 04) Provision of training

There were no technical issues with this question. Changes to equipment or working environment had been made, and the safety manager referred to a machine that had been identified during an assessment as noisy and therefore replaced. Changes to the way work is organised had been made. These were sometimes necessary if it wasn't possible to change equipment, for example to avoid problems with noise and repetitive tasks on the production line the safety manager had introduced shorter shifts and rotation between different machines. Following workplace checks, changes to working time arrangements had been taken during peak times to avoid long working hours or when workers required changes in shifts for personal reasons. The training provided was largely part of the yearly action plan whereby all workers receive annual training on their tasks, skills and areas of work.

ER209: Do you have a say in the decisions on when and where these risk assessments or workplace checks are carried out?

There were no technical issues with this question. The RLS said yes, he is always actively involved in checks and risk assessments. He was usually present during the risk assessments and many checks were prompted by himself as the employee representative. He gave the example of situation where he noticed unsafe behaviours in an external contractor and reported this to the safety manager which led to a check on this work and the decision to cease the contract. Another example was a case where he realised that there was an area in the factory that had never been checked and pointed this out to the safety manager which promptly led to a risk assessment.

ER210: If the risk assessment or workplace check identifies a need for action: Is the necessary follow-up action taken?

There were no technical issues with this question. The RLS said yes, the safety manager always took necessary actions.

ER211: And are you as health and safety representatives usually involved in the choice of follow-up actions?

There were no technical issues with this question. The RLS said yes and gave the same reasons as for ER209 above.

14.6.4 Drivers of and barriers to management of health and safety

MM171: In your establishment, how important are the following reasons for addressing health and safety? For each one, please tell me whether it is a major reason, a minor reason, or no reason at all.' 01) Fulfilment of legal obligation; 02) Requests from employees or their representatives; 03) Staff retention and absence management; 04) Economic or performance-related reasons; 05) Requirements from clients or concern about the organisation's reputation; 06) Pressure from the labour inspector

Fulfilment of legal obligation, requests from employees and pressure from the labour inspector were all deemed major reasons for addressing health and safety. Staff retention and absence management and economic or performance-related reasons were considered minor reasons. Requirements from clients were not a major reason whilst concern about the organisation's reputation was a major reason as the company was part of an internal group and the reputation of the organisation was a sensitive area.

MM172: In your establishment, what are the main difficulties in dealing with health and safety? Please tell me for each of the following whether it is a major difficulty, a minor difficulty, or not a difficulty at all.' 01) A lack of resources such as time, staff or money; 02) A lack of awareness; 03) A lack of expertise; 04) A lack of technical support or guidance; 05) The culture within the establishment; 06) The sensitivity of the issue

There were no technical issues with this question. A lack of resources, expertise, technical support and guidance and the sensitivity of the issue were not considered a problem by the safety manager. A lack of awareness and the culture within the establishment were a minor difficulty. Although these were reported to be good, it was necessary to keep reminding workers about H&S issues.

'Awareness and the culture are not an issue in the sense that there is attention and interest towards safety (in the establishment), but you cannot

stop reminding them the importance of safety rules and behaviour. In this sense is minor.'

Safety Manager

14.6.5 Worker participation and involvement

ER102: Is there a permanent committee or working group consisting of members of the management and representatives of the employees dealing with safety and health in this establishment?

There were no technical issues with this question. The RLS answered that there was no formal team that met up regularly to deal with H&S.

ER107: How often do controversies related to safety and health arise between the management and the employee representatives? Is this often, sometimes, or practically never the case?

There were no technical issues with this question. The RLS said that sometimes there were controversies within the company, mainly due to the fact that employees wanted to have more control over workers from external companies. He pointed out that inside the company there was constant monitoring of safety behaviour and RLSs were able to cover all areas and workers. However, they had no real control over the behaviour of workers from external companies working in their premises.

ER205: Are employees in this establishment regularly informed about safety and health in the workplace?

There were no technical issues with this question. The RLS said yes and referred to constant communication between himself and safety manager, boards with information and news on H&S, and an intranet where the RLS and employees could access all information regarding H&S activities in the company.

ER215_05: Please tell me whether you agree (1), neither agree nor disagree (2), or disagree (3) with the following statement: 'Our management gives proper consideration to occupational safety and health issues raised by employee or their representatives'

There were no technical issues with this question. The RLS agreed with the statement and said that the company would act and provide responses every time there was a request from an employee.

'Yes, at least they listen to what we say and assess our requests.'

RLS

14.6.6 OSH resources and training

There were no technical issues with any of the questions in this section.

ER150: Do you as the employee representative for safety and health usually get sufficient time off from normal duties to perform these tasks adequately?

The RLS said yes and mentioned that he had no problems getting time off to deal with H&S.

ER154: Does the management provide you with the necessary information for carrying out your health and safety tasks properly?

The RLS said yes and referred again to constant communication between himself and safety manager, boards with information and news on H&S, an intranet with information regarding H&S activities in the company and training provided specifically for his role.

ER155: Do you usually receive information on time and without having to ask for it?'

The RLS said yes and gave the same examples as above. He added that in the last years there had been a significant improvement in how and when the company provided information on new legislation and procedures.

ER159: On which of the following issues have you or your health and safety representative colleagues received training?01) Fire safety; 02) Prevention of accidents; 03) Chemical, biological, radiation or dust hazards; 04) Ergonomics; 05) Violence, bullying or harassment; 06) Work-related stress; 07) Discrimination (for example due to age, gender, race or disability)

The RLS had received training in fire safety; prevention of accidents; chemical, biological, radiation or dust hazards; and, ergonomics. He had not been trained in violence, work-related stress and discrimination.

ER160: Is this training sufficient or would more training in any of these fields be desirable?

The RLS thought the training was sufficient for him to deal with any H&S issues that would arise in his workplace.

14.6.7 OSH and organisational performance

There were no technical issues with any of the questions in this section.

MM402: How would you rate the level of absenteeism in your establishment compared with other establishments in the sector? Is it very high, quite high, about average, quite low or very low?

The safety manager believed their absence level was about average, comparing the data for their site with other sites in the organisation.

New question: Compared to other organisations of your size and sector in Italy, how well would you say you perform in terms of health and safety outcomes such as the number of accidents and injuries at work, and the level of sickness absence?’

The safety manager believed the company performed better than average, again basing his answer on internal data at a group level and his knowledge of the sector.

MM403: How would you rate the current economic situation of this establishment? Is it very good, quite good, neither good nor bad, quite bad or very bad?

The safety manager believed the economic situation of the establishment was neither good nor bad compared to other establishments within the organisation. At a organisational level the situation was not good, largely due to the economic crisis and other issues.

New question: Compared to other organisations of your size and sector in Italy, how well would you say you perform in terms of business outcomes such as profit, turnover or other relevant measures of performance?

Compared to other companies in the same sector the safety manager thought the situation was bad.

15 Establishment Overview ID 150612

Note: the management representative was the only person interviewed. The site did not have an RLS at the time of the interview as they were preparing for new elections. According to the manager it was difficult to make an appointment with an employee due to shift work arrangements.

15.1 Establishment background

The organisation is part of an international group in the logistic sector. The company specialises in express parcel services, door-to-door transport of all goods except for dangerous substances, valuables, and arms. The company employs around 700 people in Italy. The site where the interview was held is the operational centre, from which packs are sent out to different destinations. At this site there are 30 employees all working in administration with regular contracts. However, all of the transport is outsourced to external companies so the majority of the workers on site are employed by agencies or self-employed. These has implications for how health and safety (H&S) rules are implemented and applied in the warehouse (the company is not responsible for external workers).

15.2 Respondent profiles

The manager representative was the internal RSPP (*Responsabile del servizio di prevenzione e protezione*, Responsible for prevention and protection service) for the company with responsibility for all sites in Italy. He has been working for the company since 2005 and has a background is in management.

15.3 Organisation of health and safety

The responsibilities for H&S are based on the hierarchical structures in the company at a European and country level. The 'owner', liable in case of accidents and with legal responsibility, is the director of the company for Europe. The RSPP is responsible for the implementation of H&S and compliance with legislative frameworks at all sites in Italy. The company employs an internal occupational health doctor who covers all sites in Italy. For each site there is an appointed site manager/supervisor in charge of H&S and an RLS representative of employees.

15.4 Health and safety performance

The company did not complete the proforma.

15.5 Main technical issues

(issues with interpretation of questions, concepts and words; sensitivity of questions; problems in recall or reaching a judgment in answering)

MM159/ER 214: Overall, how would you rate the degree of involvement of the line managers and supervisors in the management of health and safety? Is it very high, quite high, quite low or very low?

The safety manager interpreted 'involvement' as whether the company was committed to complying with the legislation, so the H&S activities that had been put in place. Consequently he identified 'line managers and supervisors' ('*direzione*' and '*dirigenti*' in the Italian version of the questionnaire) as the directors' and the company's attitude towards H&S.

'I must say the attention is quite high now... I'm thinking of the fact that the company always makes sure that everything is [done] according to legislation now. For example, when there is a change in premises they ask me to supervise the works and make sure that all implants are certified, such as electric implants and that there are safety procedures in place, like evacuation procedures in case of fire alarm. Before there wasn't this attention to H&S.'

Safety Manager

MM200/ER250: For each of the following issues, please tell me whether it is of major concern, some concern, or no concern at all in your establishment? 01) Dangerous substances (eg dusts, chemical, biological); 02) Accidents; 03) Noise and vibration; 04) Musculoskeletal disorders; 05) Work-related stress; 06) Violence or threat of violence; 07) Bullying or harassment

It was clearly difficult for the safety manager to understand the purpose of this question. He asked who was supposed to be concerned, whether him or the company and asked to have the question repeated.

'Concern from whom? Whether I'm concerned or the company... I interpret this as if I'm concerned because I'm the person responsible for H&S here... Do you mean if there is concern about dangerous substances in the premises?'

Safety Manager

There was also an issue related to the wording and interpretation of 'concern'. on almost all items the safety manager interpreted 'concern' as 'being worried about either the presence of a specific risk or symptoms'. For example, he was not worried about dangerous substances because they did not use any and specified

that the main risks were from manual handling and moving goods. However, at the same time he was not worried about musculoskeletal disorders (MSDs) because workers had never suffered any symptoms of this. For item 5 (work-related stress) the safety manager specified that the risk received 'attention' rather than was a 'concern', because they 'looking into this area of risk'.

'Yes, in the sense that there is attention. We are now carrying out the risk assessment therefore there is attention on this area of risk. So far from objective measurements nothing came out but we are still in the process of analysing the data.'

Safety Manager

When asked about the difference between 'concern' and 'attention' he specified that 'concern' related to a high probability of something happening because the risk was not assessed or unknown, whilst 'attention' demonstrated that they were aware of the risk and the need assess and control it.

'I'm concerned when I believe that there is a high risk of something happening because the risk is not managed. Attention means that I know that there is a risk, I know that I need to assess that risk precisely and I'm considering how to manage that specific area of risk. But I'm not worried because if I manage it there is a low risk.'

Safety Manager

MM163: On which occasions are these risk assessments or workplace checks carried out? 01) Following a change in the staffing, layout or organisation of work; 02) At the request of employees eg in case of complaints; 03) At regular intervals, without any specific cause

In this question the safety manager referred specifically to the statutory risk assessment whilst in the previous two questions (MM162 and MM161) he referred to workplace checks. These were different types of checks. This became apparent when he said no to item 3, having mentioned earlier said that he carried out workplace checks once per year.

'The checks refer to the round that I do in all premises, to make sure that everything is ok. But we do not carry out the risk assessment, in the sense that we do not reassess the risk, without any specific cause, only if there is a significant change as required by the legislation.'

Safety Manager

MM172: In your establishment, what are the main difficulties in dealing with health and safety? Please tell me for each of the following whether it is a major difficulty, a minor difficulty, or not a difficulty at all.' 01) A lack of resources such as time, staff or money; 02) A lack of awareness; 03) A lack of expertise; 04) A lack of technical support or guidance; 05) The culture within the establishment; 06) The sensitivity of the issue

The safety manager asked to whom item 3 (a lack of expertise) should refer.

'A lack of expertise, who are you referring to? Lack of expertise from me, the workers, the directors? This is not clear... I understand this as lack of expertise amongst workers.'

Safety Manager

The safety manager believed that item 5 (the culture within the establishment) was a repetition of item 2 (a lack of awareness). The safety manager thought that item 6 (the sensitivity of the issue) should be more specific as some areas of H&S are sensitive but not others.

'You should identify better your area of interest here. If we are talking of an emergency door that need to be closed, then this in not a sensitive issue. But if we are talking about harassment, yes this is a sensitive issue.'

Safety Manager

MM402: How would you rate the level of absenteeism in your establishment compared with other establishments in the sector? Is it very high, quite high, about average, quite low or very low?

New question: Compared to other organisations of your size and sector in Italy, how well would you say you perform in terms of health and safety outcomes such as the number of accidents and injuries at work, and the level of sickness absence?'

The safety manager could not compare their performance with other establishments in the sector as he did not have access to their data. Any comparisons made looked at how the site compared with other sites in the same company.

New question: Compared to other organisations of your size and sector in Italy, how well would you say you perform in terms of business outcomes such as profit, turnover or other relevant measures of performance?'

The safety manager said he could not provide an answer as he did not have access to this data.

15.6 Summary of respondents' answers

15.6.1 Approach to management of health and safety

MM155/ER200: Is there a documented policy, established management system or action plan on health and safety in your establishment?'

There were no technical issues with this question. The company did not have a documented policy or management system. The safety manager referred to the existence of safety procedures on first aid, evacuation measures, emergency fire

procedures and safety rules in the workplace, but specified that none of these could be labelled as either a policy, management system or action plan.

MM159/ER 214: Overall, how would you rate the degree of involvement of the line managers and supervisors in the management of health and safety? Is it very high, quite high, quite low or very low?

The safety manager believed the involvement of line managers and supervisors (or as he understood it directors and company) was quite high largely because it ensured compliance with safety legislation.

15.6.2 Levels of concern with occupational safety and health risks

MM200/ER250: For each of the following issues, please tell me whether it is of major concern, some concern, or no concern at all in your establishment? 01) Dangerous substances (eg dusts, chemical, biological); 02) Accidents; 03) Noise and vibration; 04) Musculoskeletal disorders; 05) Work-related stress; 06) Violence or threat of violence; 07) Bullying or harassment

The safety manager believed dangerous substances were not a concern because they did not use any. Accidents were a concern in the sense that there was always a possibility of one occurring, whatever the circumstances. According to the safety manager noise and vibration were not a concern because these risks were not present. MSDs were not a concern because workers had not complained of any symptoms. Work-related stress was a concern in the sense that the company was carrying out a risk assessment and considering this area of risk. Violence and bullying/harassment were not concerns as the safety manager had never heard any complaints about either of these.

15.6.3 Risk Assessment

MM161/ER207: Are workplaces in the establishment regularly checked for safety and health as part of a risk assessment or similar measures?

There were no technical issues with this question. The safety manager performed safety checks in all sites at least once per year.

MM162: Are these risk assessments or workplace checks mostly conducted by your own staff or are they normally contracted to external service providers?

There were no technical issues with this question. The checks were all conducted by the safety manager, except for statutory checks requiring a certified expert such as checks to fire extinguishers, electric implants, lifts etc..

MM163: On which occasions are these risk assessments or workplace checks carried out? 01) Following a change in the staffing, layout or organisation of work; 02) At the request of employees eg in case of complaints; 03) At regular intervals, without any specific cause

The safety manager said that a risk assessment was conducted in the case of change in the staffing, layout or organisation of work (but only if there was a change in the external supplier, not if new workers were brought in. A risk assessment could be carried out if they received a request from an employees but was not carried out without a specific cause.

MM164: Which of the following areas are routinely considered in these checks?' 01) Equipment and working environment; 02) The way work is organised; 03) Irregular or long working hours; 04) Supervisor-employee relationships

There were no technical issues with this question. Equipment and the working environment were routinely considered whilst the way work was organised and irregular or long working hours were not part of a risk assessment or check. The safety manager explained that the only workers they were responsible for were those employed by the company who had administrative functions and worked regular hours. Supervisor-employee relationships had not been considered previously but they planned to look into this area and include it in routing checks.

MM166: And which of the following actions have been taken as a follow-up to these checks?' 01) Changes to equipment or working environment; 02) Changes to the way work is organised; 03) Changes to working time arrangements; 04) Provision of training

There were no technical issues with this question. Changes to the working environment such as new toilets or air conditioning implants had been made following checks but not equipment, largely because the company workers were all office-based so did not use equipment that presented any issues. No changes had been made to the way work was organised or working time arrangements. The safety manager had provided training to all employees in the different sites as following a check it emerged that they had never received any training on basic H&S procedures.

15.6.4 Drivers of and barriers to management of health and safety

MM171: In your establishment, how important are the following reasons for addressing health and safety? For each one, please tell me whether it is a major reason, a minor reason, or no reason at all. 01) Fulfilment of legal obligation; 02) Requests from employees or their representatives; 03) Staff retention and absence management; 04) Economic or performance-related reasons; 05) Requirements from clients or concern about the organisation's reputation; 06) Pressure from the labour inspector

There were no technical issues with this question. Fulfilment of legal obligation, requests from employees or their representatives and pressure from the labour inspector were all deemed major reasons for addressing H&S. whilst staff retention and economic or performance-related reasons were not considered a priority. The safety manager explained that he had never had to consider requirements from clients or concern about the organisation's reputation in his role.

MM172: In your establishment, what are the main difficulties in dealing with health and safety? Please tell me for each of the following whether it is a major difficulty, a minor difficulty, or not a difficulty at all. 01) A lack of resources such as time, staff or money; 02) A lack of awareness; 03) A lack of expertise; 04) A lack of technical support or guidance; 05) The culture within the establishment; 06) The sensitivity of the issue

A lack of resources such as time, staff or money was not considered a problem. A lack of awareness and the culture within the establishment were major problems, largely with reference to agency workers. The safety manager explained that it was difficult to educate agency workers towards safe behaviour and gave the example of vans parked in front of emergency exits and fire extinguishers used to hang jackets on. Additionally, these agency workers had huge pressure to deliver on time and worked long hours, meaning that H&S was often neglected.

'Agency workers are under huge pressure to deliver and agencies do not care whether they wear safety boots or not, if they are trained on safety behaviour or not... they work from 7pm to 7am and they just have to deliver. Plus the majority of these workers are immigrants with no language skills, and cultural differences play a role as well. Put all these factors together and you have zero attention to, awareness and knowledge of safety. We try to help with, for example, signs in all languages and we often explain to them the importance of following the rules.'

Safety Manager

A lack of expertise was a major difficulty faced by the establishment whereas a lack of technical support and the sensitivity of the issue were not considered difficulties.

15.6.5 OSH and organisational performance

MM402: How would you rate the level of absenteeism in your establishment compared with other establishments in the sector? Is it very high, quite high, about average, quite low or very low?

The safety manager believed the level of absenteeism was very low, on the basis of data from other sites in the company.

New question: Compared to other organisations of your size and sector in Italy, how well would you say you perform in terms of health and safety outcomes such as the number of accidents and injuries at work, and the level of sickness absence?’

The safety manager believed that the company performed better than average. He referred to the fact that the majority of accidents and injuries happened during commuting time. However, he did not have any data on other establishments in the sector.

‘All employees are administrative workers and it is almost impossible to have an injury, all accidents we register are during commuting time.’

Safety Manager

MM403: How would you rate the current economic situation of this establishment? Is it very good, quite good, neither good nor bad, quite bad or very bad?

There were no technical issues with this question. The safety manager believed the economic situation was quite good, on the basis that the company was expanding whilst competitors had to close sites or had been bought by other companies.

New question: Compared to other organisations of your size and sector in Italy, how well would you say you perform in terms of business outcomes such as profit, turnover or other relevant measures of performance?

The safety manager said he could not provide an answer as he did not have access to this data.