

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

European Risk Observatory

National Report: France

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List of French stakeholders mentioned in the report

Institutional stakeholders

Main stakeholders of the government in the field of OSH:

DGT: General Directorate for Labour (Ministry of Labour)

CNAMTS: National Health Insurance Fund for Salaried Workers

DRP: Directorate for Occupational Risks (related to CNAMTS)

National stakeholders involved in prevention:

ANACT: National Agency for Improvement of Working Conditions

ANSES: National Agency for Food, Environmental and Occupational Health and Safety

INRS: National Research and Safety Institute for the prevention of occupational accidents and diseases

OPPBTP: French Professional Agency for Risk Prevention in Building and Civil Engineering

MSA: French Agricultural Social Security Scheme

Regional stakeholders involved in prevention:

ARACT: Regional Agency for Improvement of Working Conditions

CARSAT: Regional Health Insurance Fund

CRAMIF: Paris Region Regional Health Insurance Fund

DIRECCTE: Regional Directorates for Companies, Competition, Consumption, Labour and Employment

SIST (also known as *SSTI*): Inter-enterprise occupational health service

Intermediaries

Professional and training organisations:

AFT: Transport Training Association (*Association Formation Transport*), a professional association of the road transport sector focusing on training

CCIs: Chambers of Commerce and Industry, regional private organisations representing the interests of commercial and industrial enterprises

IRIS-ST: a trade association in the construction sector, a private organisation (an innovation centre for simplified tools, trade by trade, for satisfying regulatory obligations)

OPCA TS: a public non-for-profit organisation in the road transport sector, which collects contributions from companies and organises training

Employers and employees representatives:

CAPEB: a private employer confederation of the construction sector; took an active part in setting up the IRIS-ST

CGT and CFE-CGC: two French trade unions

FAGITH/GNI: a professional association of the hotel, restaurant and catering (Horeca) sector

OTRE: a private transport employer federation in the transport sector

UMIH: a private trade association in the Horeca sector

MEDEF: main employers' organisation

The aim of this report is to describe the national context of micro- and small enterprises (MSEs) in France, the sample and the results of the analysis of the experience of occupational safety and health (OSH) intermediaries and actors in promoting effective prevention in French MSEs. Understanding the practices, opinions, barriers and facilitators of these different OSH actors makes it possible to better know their needs for improving OSH management and preventive action in MSEs.

These data collected in France have been used for a comparative analysis with the other EU Member States participating in the research project (EU-OSHA, 2017).

1 Description of the national context

This section aims to describe the context of MSEs in France, their economic profiles, and data about accidents and occupational diseases. We present the OSH framework with the specific institutions and stakeholders, the national OSH strategy and agreements, and the particular actions targeting MSEs. This description of the national context is useful for understanding the roles, functions and practices of the OSH stakeholders in France and to better know their relationship with MSEs.

1.1 Characteristics and economic profile of MSEs

In France, a decree¹ defines companies based on economic criteria, whereas they had previously been defined exclusively on legal considerations. Four categories are distinguished: micro-enterprises, small and medium-sized enterprises (SMEs), intermediate-sized enterprises and large enterprises. There are three criteria for classifying companies: the workforce, the turnover and the balance sheet total². Micro-enterprises, for example, are companies with between one and nine employees, with an annual turnover or a balance sheet total that is less than EUR 2 million. SMEs have between 10 and 249 employees, with an annual turnover not exceeding EUR 50 million or a balance sheet total lower than EUR 43 million. Hence, disaggregated figures for small (10-49 workers) and medium-sized enterprises (50-249 workers) were sometimes hard for the research team to get hold of in French publications.

As shown in Table 1, 99.85 % of French enterprises are micro-, small and medium-sized enterprises employing fewer than 250 people.

Table 1. Main characteristics of companies by category in 2013

Size	Number of companies	Percentage of companies	Number of employees on 31 December (in thousands)	Percentage of employees
Micro-enterprises (<10 workers)	3,606,741*	96.17	2,767	20
SMEs (10-249 workers)	138,117	3.68	4,129	29
Intermediate enterprises (250-4,999 workers)	5,332	0.14	3,392	24
Large enterprises (5,000 workers or more)	274	0.01	3,743	27
Total (rounded)	3,750,454	100	14,032	100

¹ The decree of 18 December 2008, no 2008-1354. Further details on the website of the government, page consulted in November 2016: <https://www.legifrance.gouv.fr/affichTexte.do?cidTexte=JORFTEXT000019961059>

² Published data have to include details if an enterprise does not fit into these criteria (number of employees + turnover); see Article 4 in the above mentioned decree.

Field: France, enterprises within the meaning of decree 2008-1354 (including micro-enterprises for tax purposes and micro-entrepreneurs) whose main activity is non-financial and non-agricultural, excluding public administrations.

*Including companies with no employees.

Source: INSEE, 2016a.

MSEs are also major employers. In 2013, 3.61 million micro-companies employed about 2.8 million employees in France (20 %), while about 138,000 small and medium enterprises had 4.2 million employees (29 %). All in all, 49 % of employees worked in micro-, small and medium-sized companies, whereas most of the small and medium-sized companies had fewer than 20 employees (60 %) and only 12 % of them had more than 50 employees (INSEE, 2016a).

Table 2 shows the percentage of employees in different sectors and their distribution by size classes of enterprises.

Table 2. Employees by sector and category of enterprises in 2012

Sector	Large (> 5,000 workers) (%)	Intermediate (250-4,999 workers) (%)	Small and medium (10-249 workers) (%)	Micro (1-9 workers) (%)	Number of employees (in thousands)
Manufacture	33	32	26	9	3,515.7
Construction	21	8	37	34	1,504.6
Wholesale and retail trade, accommodation and food service activities	30	21	27	22	5,276.8
Information and communication	39	28	24	9	669.9
Financial activities	78	12	5	5	801.7
Real estate activities	4	37	29	30	204.2
Specific scientific and technical activities, administrative service and support activities	19	24	36	21	1,848.2
Education, social and healthcare service activities	11	25	34	30	1,035.6
Total	30	23	28	19	14,856.6

Field: France, firms whose main activity is not in agriculture, excluding public administrations, according to the French nomenclature of activities revision 2, 2008.

Source: INSEE, 2016b.

In construction, 71 % of workers are employed in micro-, small and medium-sized companies (with 34 % of employees in micro-enterprises and 37 % in small and medium-sized companies), despite the presence of 10 large enterprises in the market. Micro-, small and medium-sized enterprises employ the

majority of their workers in services for private individuals, especially in real estate activities, administrative and support activities, human health and social work activities and specific scientific and technical activities. In wholesale and retail trade, and accommodation and food service activities, half of the employees are from micro-, small and medium-sized companies (INSEE, 2016b).

1.2 Occupational accidents in MSEs

In France, small enterprises (with 10-49 employees) have the highest proportion of severe and fatal work accidents. Micro- and medium-sized companies also have a large number of work accidents, closer to the results for small enterprises than for larger companies. Overall, 58 % of severe work accidents and 65 % of fatal work accidents happen in MSEs, which is much more than in enterprises having more than 250 employees (13 % of severe accidents and 9 % of fatal accidents). These figures have changed very little from 2008 to 2014 (see Table 3).

Table 3. Severe work accidents (with 4 days off work or more) and fatal accidents in France, between 2008 and 2014, by size (%)

Size (number of employees)	2008	2009	2010	2011	2012	2013	2014*
Severe work accidents							
0	0.49	0.51	0.4	0.38	0.35	0.03	0.03
1-9	21.45	22.88	22.61	21.96	21.9	21.87	24.56
10-49	33.77	34.88	34.37	34.2	34.5	34.93	33.26
50-249	30.59	29.08	29.65	29.84	30.08	29.88	28.5
250-499	8.12	7.38	7.52	8.11	7.76	7.69	7.46
500 or more	5.58	5.28	5.45	5.52	5.41	5.38	5.48
Unknown	0	0	0	0	0	0.21	0.71
Total	100	100	100	100	100	100	100
Fatal work accidents							
Size (number of employees)	2008	2009	2010	2011	2012	2013	2014*
0	0.39	0.81	1.55	1	2.67	0	0
1-9	28.19	27.85	25.83	27.94	27.86	27.24	30.17
10-49	35.52	34.96	36.87	36.93	31.87	33.54	34.43
50-249	28.19	23.98	26.05	23.95	23.66	28.05	23.6
250-499	5.41	4.47	3.97	7.19	7.25	5.49	4.84

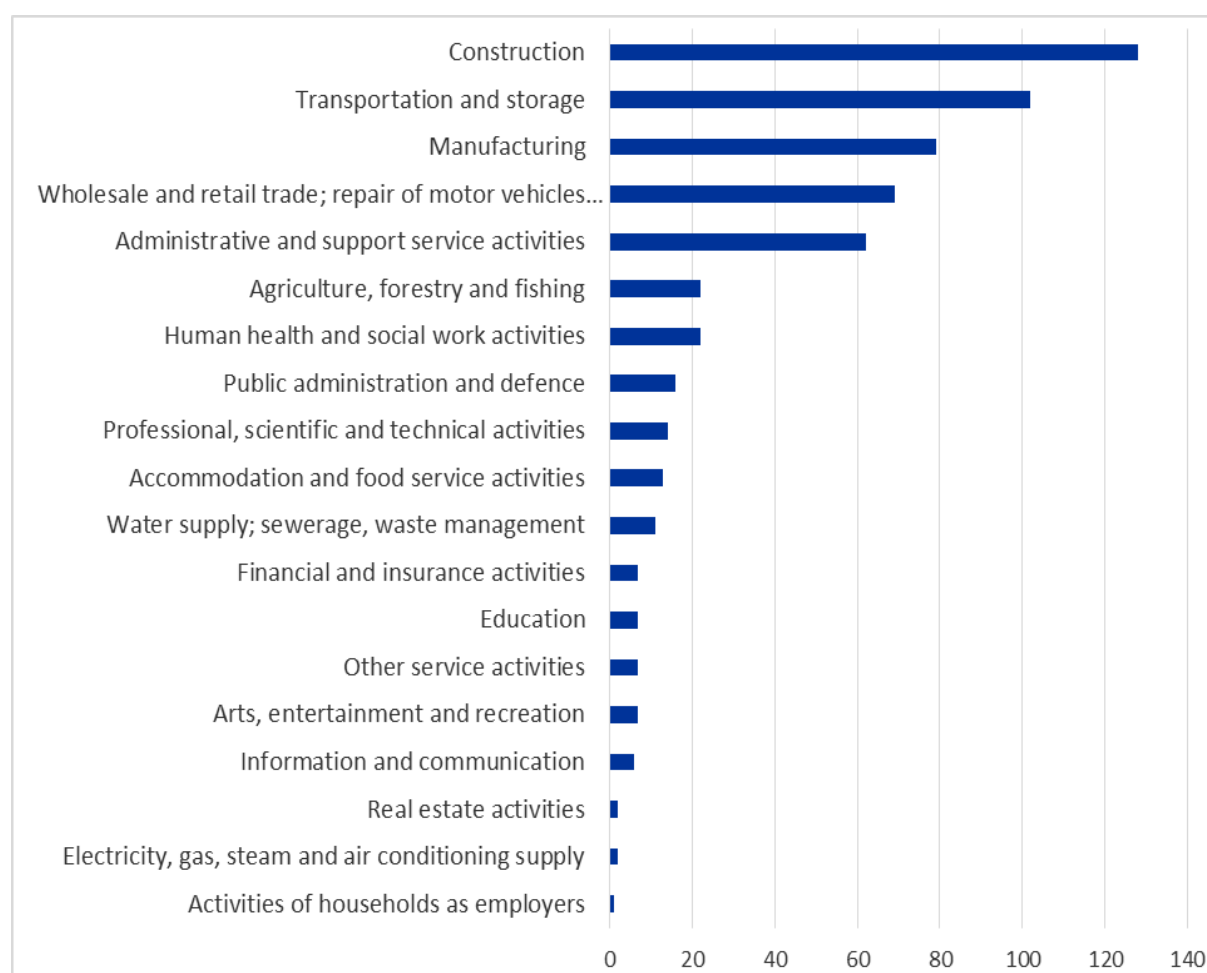
Size (number of employees)	2008	2009	2010	2011	2012	2013	2014*
500 or more	2.32	7.93	5.74	2.99	6.68	4.07	4.45
Unknown	0	0	0	0	0	1.63	2.51
Total	100	100	100	100	100	100	100

All activities, excluding mining and quarrying, public administration, defence, education, human health and social work activities and other services.

* Break in time series.

Source: Eurostat, 2017.

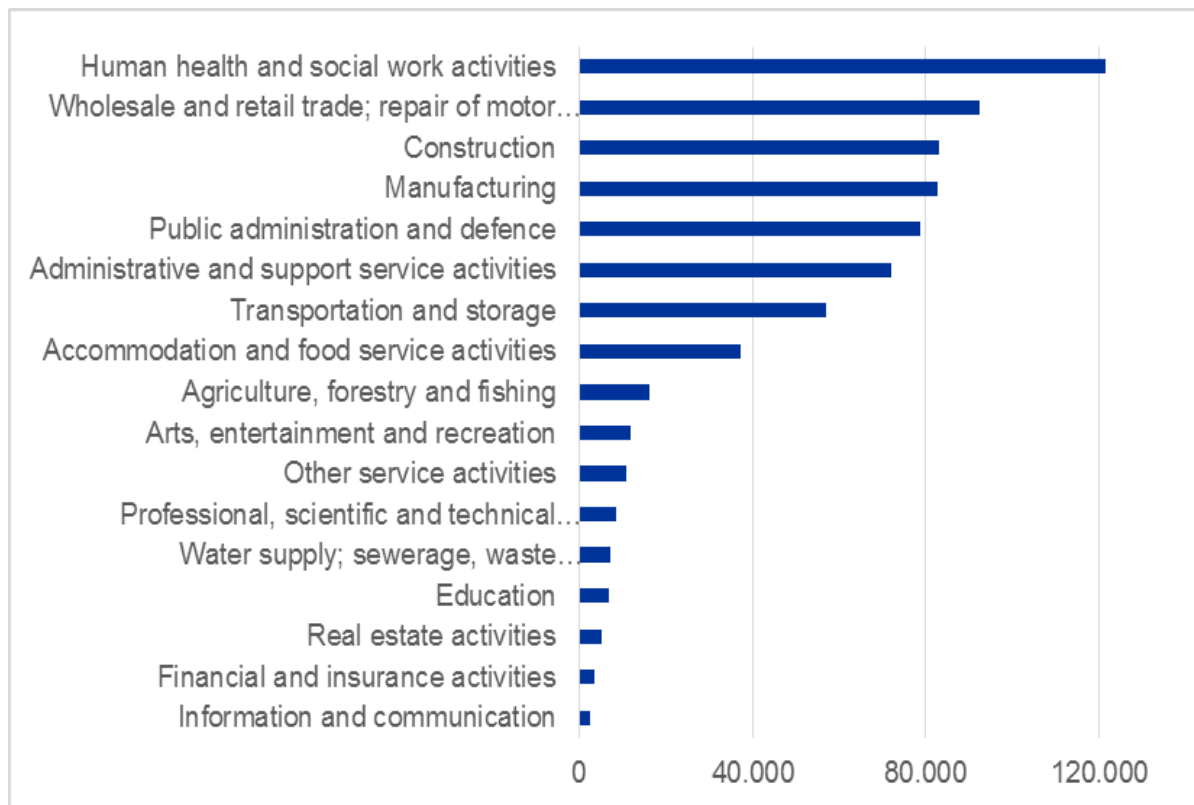
Figure 1. Distribution of fatal work accidents among sectors of activity in France, 2014 (number)



Source: Eurostat, 2017

In France, five sectors of activity have the highest numbers of fatal accidents: construction; transportation and storage; manufacturing; wholesale and retail trade; and administrative and support services (Figure 1). Considering these five sectors and the distribution of employees by sector and category of enterprises (Table 2), large proportions of employees are working in micro-, small and medium-sized companies in construction (71 %) and in administrative and support services (57 %), while only 35 % of the employees of the manufacturing sector are in MSEs. The score is more balanced in wholesale and retail trade (together with accommodation and food service activities), with 49 % of the employees in micro-, small and medium-sized companies and 51 % in larger companies (more than 250 workers). This sector has a quite high number of non-fatal accidents, as human health and social work activities (see Figure 2).

Figure 2. Distribution of non-fatal work accidents among sectors of activity in France, 2014 (number)



Source: Eurostat, 2017

1.3 OSH framework

Overall, the French regulations do not differentiate the occupational health and safety measures according to the size of the company. There are differences between enterprises in specific cases: it is, for example, possible to have its own internal medical service rather than an external one (often seen in larger companies), and first aid training must be provided to workers in enterprises where more than 20 employees perform any work considered hazardous.

1.3.1 Legislative framework

According to the law that promotes the prevention of occupational risks (No 91-1414 of 31 December 1991), employers must take necessary measures to ensure their workers' safety and protect their health based on an assessment of risks identified in the company (INRS, 2009). The employer must implement the general principles of prevention laid down in the Labour Code (L.4121-2) and particularly eliminate

or limit workers' exposure to physical, chemical or biological hazards. Regarding the latter law, the employer is also under an obligation in terms of safety results, which is more demanding than an obligation of safety means. Moreover, according to the Social Security Code (L.461-4), the employer is responsible for applying medical prevention measures in the company (INRS, 2016).

Other key prevention stakeholders are occupational health services (external or internal), as well as workers or bodies representing them. Within companies, OSH bodies vary depending on the size of the establishment. There are (Ministère du Travail, 2016a):

- health, safety and working conditions committees (*comités d'hygiène, sécurité et conditions de travail*, CHSCTs) in all establishments with at least 50 employees;
- staff delegates (*délégués du personnel*) in enterprises having more than 10 employees;
- one or several employees competent to handle the prevention of occupational risks in micro-enterprises (under 11 employees).

Therefore, CHSCTs generally do not exist in MSEs, and OSH issues are treated by competent employees or staff delegates.

1.3.2 National OSH strategy

The national OSH strategy is organised through two key agreements (the COG and the PST3). Some objectives within these agreements target the development of prevention in MSEs.

The French Government and the Occupational Accidents and Diseases (AT/MP) Branch of the National Health Insurance Fund for Salaried Workers (CNAMTS) set objectives and management agreements to improve the performance of the social protection system in a contractual document named **COG** (*Convention d'Objectifs et de Gestion AT/MP*). The COG contributes to coordinating the OSH activities of the CNAMTS, the National Research and Safety Institute for the prevention of occupational accidents and diseases (INRS) and regional health insurance funds (CARSATs). For the period 2014-2017, a collective strategy (CNAMTS, 2014) has been defined in order to implement effective prevention of occupational risks in four priority sectors (road transport, restaurant, car repair, bricklayers). These sectors are mainly composed of MSEs and have a high annual accident rate.

The third Occupational Health Plan (**PST3**) has a specific objective about micro-, small and medium-sized enterprises (Ministère du Travail, 2016b). The French Government adopted the third Occupational Health Plan (*Plan Santé au Travail*, PST3) for 4 years, covering the period 2016-2020. PST3 aims to improve the prevention culture and work health promotion. This plan is based on a consensus among the government, the French social security institutions, the social partners and the prevention institutions, in partnership with a large number of occupational health stakeholders. The Working Conditions Advisory Committee (*Conseil d'orientation des conditions de travail*, COCT) sets strategic directions and organises the plan around three axes:

1. to give priority to primary prevention and to develop a culture of prevention;
2. to improve the quality of work life and maintain the employment of workers as well as the economic and social performance of the company;
3. to strengthen social dialogue and the resources of the prevention policy, by structuring a system of stakeholders, in particular for SMEs.

This last objective aims to design actions in prevention that meet as closely as possible the needs and concerns of SMEs, especially by improving the coordination of regional stakeholders and the consistency of their prevention approach, as well as supporting these enterprises with concrete measures related to their sector of activity. In order to combine efficiency and coherence, these 3 axes are broken down into 10 operational objectives, which in turn are structured into target actions. Two of these actions concern MSEs (actions 1.1 and 3.7).

Action 1.1 aims to develop a primary prevention culture in MSEs (including 'OIRA/sectoral risk assessment tool MSEs') and coordinate prevention stakeholders: the CNAMTS, the CARSATs and the French Professional Agency for Risk Prevention in Building and Civil Engineering (OPPBTP). It is steered by the General Directorate for Labour (DGT) and involves supporting MSEs in creating a single risk assessment document (*Document unique d'évaluation des risques*, DUER). The first meeting between the various stakeholders took place in November 2016 in order to start with a state of play and

define a roadmap: to identify tools and approaches existing in France. Based on these findings, concrete actions such as simplifying regulations or merging tools such as the risk assessment document and the 'enterprise datasheet' (*fiche d'entreprise*) or reviewing the application procedures about safety referent are to be designed, in order to make these actions more coherent with the practices of MSEs and with improving risk prevention.

Action 3.7 aims to structure the offer of services to SMEs by sector: to identify strategic stakeholders and occupational safety and health experts by professional branch and to make an inventory of existing programmes and approaches in order to better understand practices of strategic intermediaries who help micro-, small and medium-sized companies in the implementation of risk prevention. Here, the role of the labour inspectorate has to be strengthened on both parts, in advising and supporting SMEs (not only on the monitoring side, there is a need to adapt and recreate dialogue). The role of the stakeholders in the inter-enterprise occupational health services (SISTs) has also to be developed as a key intermediary in prevention for SMEs (reform of the profession of occupational physician, multidisciplinary). The partnership with strategic stakeholders related to the professional branch (professional associations, the Chambers of Commerce and Industry (CCIs), and so on) has to be built up to enable the SISTs to offer services.

The role of the DGT is to ensure that PST3 targets risk prevention and MSEs. Both previous prevention plans (PST1 and PST2) were already oriented on them, but the results were insufficient. The focus of PST3 on MSEs is therefore a continuation of those previous plans. Currently, only one third of MSEs have an updated mandatory risk assessment document. Therefore, the aim is to accompany and enable MSEs in doing the legal risk assessment (statutory obligations of the Labour Code).

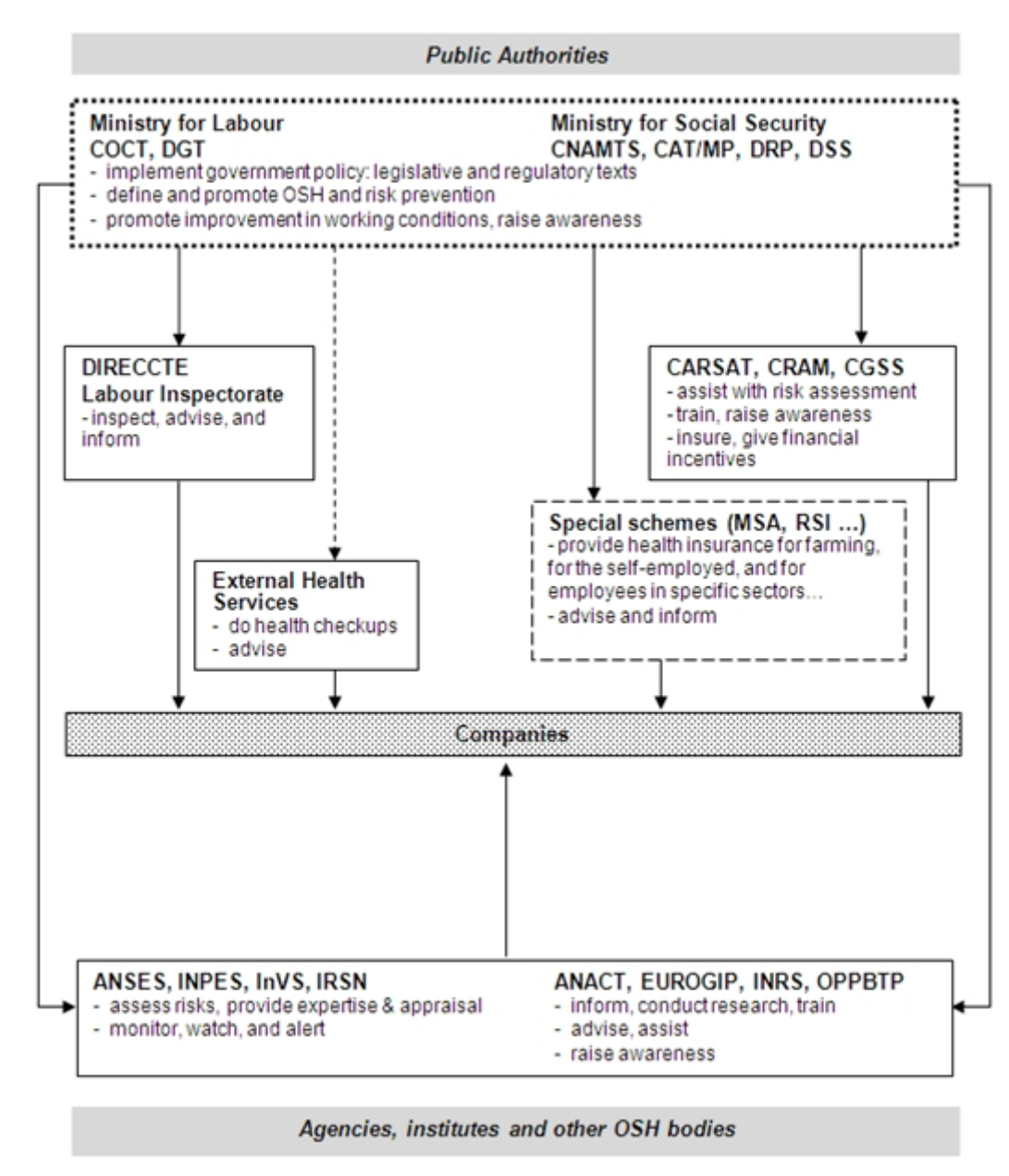
1.3.3 Institutional stakeholders

Here we introduce the key institutional stakeholders in relation to OSH in France. Some of them have to check specifically the compliance with the law; others provide financial support to companies, advice about prevention approaches and OSH training. They are all managed by the French government.

In the French government, two ministries are involved in occupational health and safety: the Ministry of Labour and the Ministry of Solidarities and Health.

Specifically, the two main OSH stakeholders of the French government are the Ministry of Labour and the CNAMTS, a single compulsory insurance against occupational risks. The CNAMTS is a social security body managed by a board of social partners. Figure 3 aims to give a picture of the general OSH infrastructure in France.

Figure 3. General OSH infrastructure in France in 2017

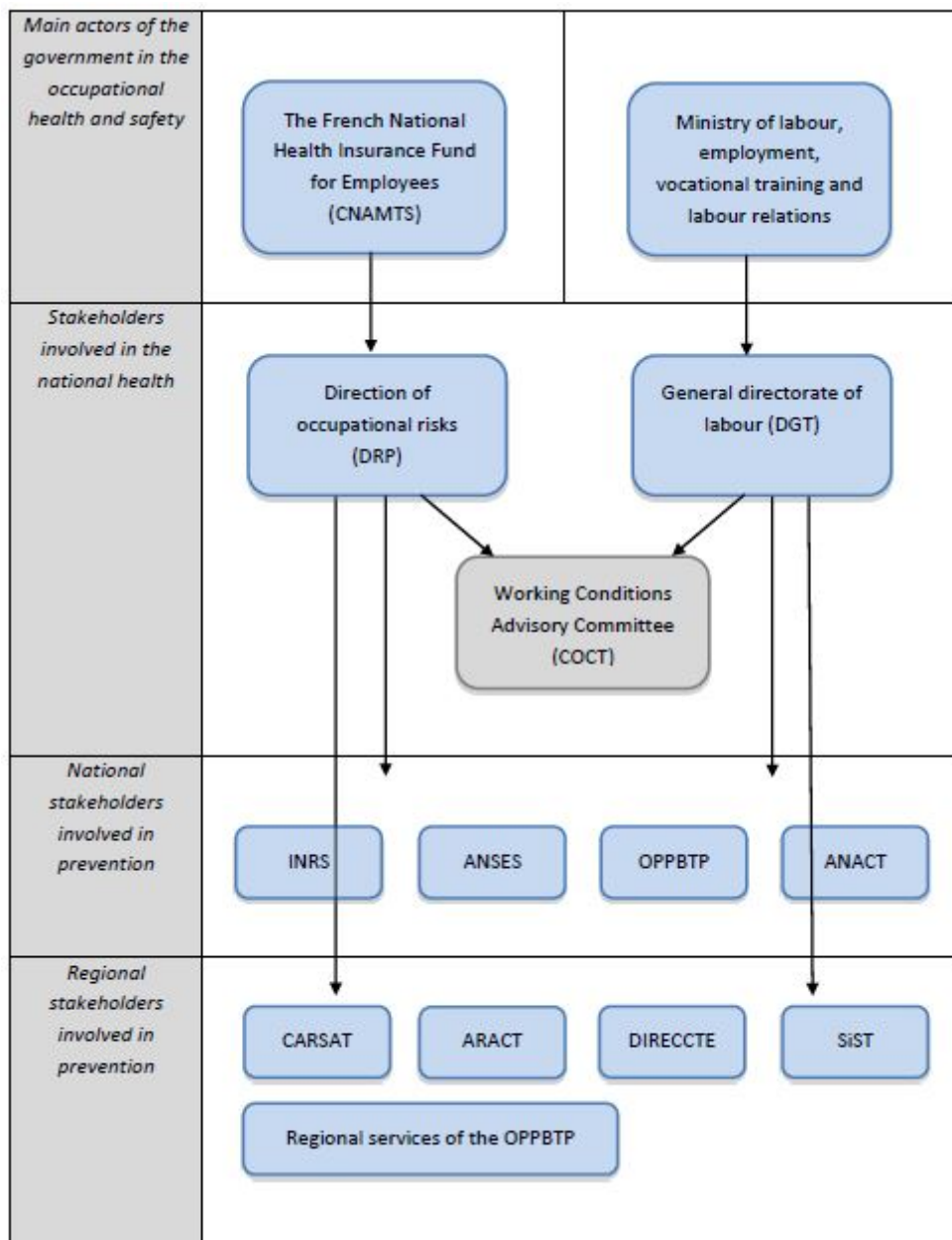


Source: Jandrot, 2012, updated by Daniault, 2017

▪ **General Directorate of Labour (DGT)**

The General Directorate of Labour (DGT), within the Ministry of Labour, prepares, directs and coordinates labour policy in order to improve collective and individual relations at work, working conditions in companies, and the quality and effectiveness of the law governing them. It incorporates European directives about occupational health and safety into national law (Ministère du Travail, 2016c). Then, the Directorate for Occupational Risks (DRP), within the CNAMTS and attached to the Ministry of Solidarities and Health, decides with the DGT on the programming of priority prevention actions and their funding (Figure 4).

Figure 4. Main stakeholders involved in OSH in France



▪ **Regional Directorates for Companies, Competition, Consumption, Labour and Employment (DIRECCTE)**

The DIRECCTE is an inter-ministerial body of officials whose main task is to oversee the proper application of French labour legislation in enterprises. Labour inspectors, working for the DIRECCTE, check compliance with the regulatory framework in companies and intervene in all establishments, regardless of their size. They have a compliance approach; they may intervene unexpectedly in the context of a (surprise) visit concerning a specific problem or following a complaint by an employee. In general, they provide spoken advice during the visit, and can then act by sending the employer a letter of observation (warning) requiring compliance, if the company does not comply with the labour legislation. They could issue a warrant of infringement, if necessary. Following that decision, bodies linked to the Ministry of Justice would intervene in order to judge the case.

- **National Institute of Research and Safety (INRS)**

The role of the INRS is to provide OSH advice and information to companies, to participate in risk prevention programmes as a state institution and to develop studies and research to produce new knowledge on occupational safety and health in partnership with researchers or practitioners. The INRS is considered an expert partner in the definition of the guidelines and the actions of the national plan of occupational health (PST3) led by the Ministry of Labour.

Concretely, the INRS participates in the four programmes concerning actions in risk prevention among MSEs (in partnership with the CNAMTS and regional CARSATs). It develops practical advice and tools adapted to MSEs, in particular the MAVImplant software (for three-dimensional simulation of premises and equipment, for garages and bakeries) and the Online interactive Risk Assessment Tool (OiRA) software.

The employer of a French enterprise can rely on internal and external resources for implementing prevention of risks in his or her own establishment: those inside the enterprise (employees and their representatives), the external institutional stakeholders at regional level (CARSAT, Regional Agency for Improvement of Working Conditions (ARACT), DIRECCTE, SIST and regional offices of the OPPBTP) and national level (CNAMTS, INRS, National Agency for Improvement of Working Conditions (ANACT), OPPBTP, National Agency for Food, Environmental and Occupational Health and Safety (ANSES)) (see List of French stakeholders for further details). Overall, national and regional stakeholders advise and support companies in the prevention of occupational risks.

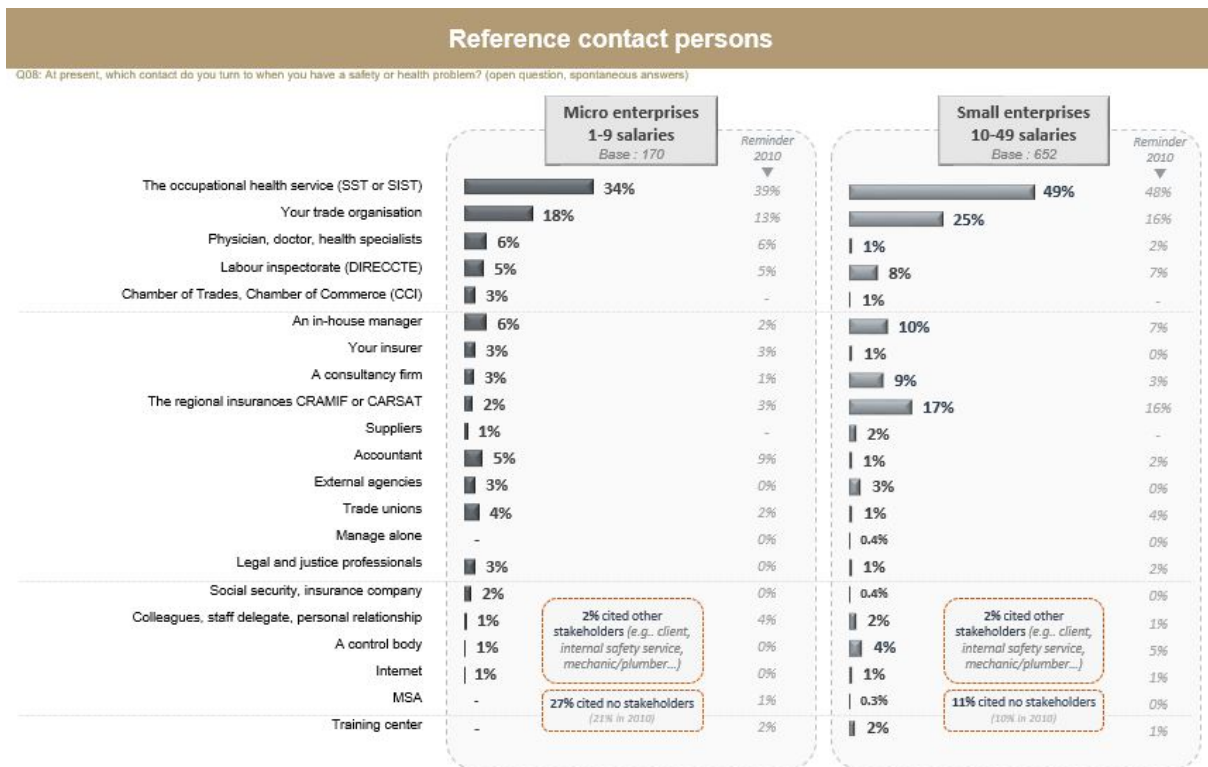
- **Intermediaries**

Besides all these institutions, there are other stakeholders acting in prevention. We find trade associations, training organisations, private insurances, trade unions and employers' representatives (see List of French stakeholders for further details). Most of these organisations are private but receive some public funds: we had no precise indications of public/private funding ratios and they differ from one organisation to another. In addition to this, they collect their private funding, namely the contributions of their members, in a variety of ways; for example, some of them receive contributions according to the pay of each member (a certain percentage of the salary), and others according to a fixed rate for all members. We further discuss the role and impact of these intermediaries in the findings below.

- **Prevention stakeholders and MSEs**

The main requesters of advice for prevention are large companies on the one hand and establishments in the human health and social work sector (hospitals) in the other hand (DARES, 2016). In France, employers are not legally required to contact prevention stakeholders; however, according to OSH regulations (see section 1.3.1), they have to look after occupational risks in their own enterprises. Therefore, they should have an interest in contacting such stakeholders. MSEs take advice about OSH issues from different institutions and stakeholders, as shown in Figure 5.

Figure 5. Stakeholders that would be contacted by MSEs in case of safety or health problem (in percentage).



Source: Laine and Malenfer, 2015.

Overall, micro-companies (1-9 employees) request less help from stakeholders (27 % mentioned that they didn't contact any stakeholders) than companies with 10-49 employees (11 %). The stakeholder most often asked the SIST for help for both sizes of company (34 % and 49 % respectively). These companies also contact their trade associations (18 % for micro-enterprises, 25 % for small enterprises), and less frequently the labour inspectorate (DIRECCTE: 5 % for 1-9 workers and 8 % for 10-49 workers). Prevention organisations (CARSAT, Paris Region Regional Health Insurance Fund (CRAMIF)) are more often contacted by small enterprises (17 %) than by micro-enterprises (2 %), as are consultant firms (9 % of the small companies and 3 % of the micro-companies). For MSEs, requests to training centres, insurances (French Agricultural Social Security Scheme (MSA), social security, insurance companies), external agencies and suppliers are not very frequent.

2 Design of the data collection

The collaboration with INRS facilitated the establishment of contacts with different key stakeholders concerning OSH in MSEs at both national and regional levels. During recent years, various stakeholders of the construction, road transport, and hotel, restaurant and catering (Horeca) sectors collaborated with the INRS on the development of OSH programmes. They have therefore already worked together in some preventive actions and we used these networks as a starting point for mobilising experienced individuals in risk prevention in MSEs. Then, more participants were contacted in order to have the four expected types of actors for each selected sector: OSH professionals, employers and employers' representatives, workers and workers' representatives, and OSH regulators. As some invited stakeholders did not take part in the dialogue workshop or were identified by some workshop participants during the meeting as being also prevention stakeholders, we conducted additional interviews to complement the findings from the dialogue workshop.

We organised the dialogue workshop in Paris for logistical reasons, because most of the stakeholders contacted were located in that area. As enterprises consulted in the previous phase of the project (EU-OSHA, 2018) were rather spread across the national territory, it was unfortunately not easy for them to come to the dialogue workshop, and this has severely limited their participation.

A date was set for a 1-day workshop, bringing together all identified stakeholders related to the three defined sectors, which include a large number of MSEs. OSH advisors and trade associations were easily convinced to participate, while worker and employer representations were more difficult to attract, as were some OSH regulators.

In the morning the stakeholders were separated by sector of activity: road transport, construction, Horeca. They had a discussion about roles, practices, incentives and obstacles in OSH preventive activities in MSEs. In the afternoon, they were divided by type of stakeholder to discuss strategies and needs in OSH activities in MSEs: (1) regulatory organisations and OSH advisors (CARSAT, CNAMTS, CRAMIF, ANACT, SIST and OPPBTP), (2) trade associations and (3) social partners.

3 Findings

The findings presented are based on the data collected during the dialogue workshop and the additional interviews. Three sectors were particularly explored during the dialogue workshop: construction, road transport in goods and Horeca. Stakeholders were asked about their role, function and concrete practices in prevention among MSEs. Then, questions and discussions were focused on the obstacles and facilitators that they had to deal with. They were finally invited to speak about their needs and their suggestions for improving risk prevention in MSEs.

3.1 Role, function and practices of stakeholders in OSH improvements in MSEs

We firstly present the findings about interviewed stakeholders that are part of the OSH infrastructure (the DGT, the DIRECCTE, the MSA and the INRS), before addressing responses given by other institutional stakeholders during the dialogue workshop (the CARSATs, the CNAMTS, the CRAMIF, the ANACT, the SISTs and the OPPBTP). We then introduce the answers given by the intermediaries, during the interviews (the insurers Klésia and Malakoff) and the dialogue workshop (the OPCA TS, the Transport Training Association (*Association Formation Transport*, AFT), the IRIS-ST, the CCIs, the UMIH, the FAGITH/GNI, the CAPEB, the CGT, the CFE-CGC and the OTRE).

3.1.1 Institutional stakeholders

- Findings from interviews

This section presents findings based on the data collected through the additional interviews with stakeholders who were not present during the dialogue workshop. The persons interviewed included staff of the DGT (Ministry of Labour), two labour inspectors working in the DIRECCTE, and two INRS project managers for prevention in MSEs. In addition, a prevention engineer, attached to the MSA and working in a support unit of the labour inspectorate, was interviewed because of his long experience in improving prevention in the agricultural sector in MSEs. All these stakeholders work for institutions and parts of the French OSH infrastructure (see Figure 3).

In practice, the labour inspector of DIRECCTE focuses on the effective implementation of prevention in MSE. He or she can use coercive measures such as formal notice or minutes, but reaching this last stage is sometimes seen as a failure: negotiations with the employer have not led to concrete actions in favour of the workers' health and safety. An intervention is considered successful when it leads to an awareness of risks in the company, during and following the visit, with effective improvement of the work organisation and healthier working conditions for employees.

An example of a collective action in prevention among MSEs in the wood sector, in about 150 companies (mainly small enterprises), carried out by labour inspectors, was given. The labour inspectors first conferred so that they would say the same things and to define the actions in their future interventions: checking the dust aspiration equipment in all companies operating on their territory, and checking that in practice that the regulations were complied with and the machines used in these enterprises were maintained according to the standards. This initiative has created a new dynamic at the level of the companies concerned. They mobilised the trade organisations of their sector of activity and the latter supported them financially and technically to install or upgrade their equipment.

Various collective actions are put in place within the DIRECCTE by order of the Ministry of Labour. They relate to a particular topic, such as the risk of falling from height. In the case of MSEs, there was an action concerning the consideration of psychosocial risks in the DUER. Inspectors also refer owner-managers to regional insurers (such as the CARSAT) so they can obtain subsidies to update their compliance. Some collective actions may also be introduced on the basis of problems encountered in the field, following feedback from labour inspectors.

In the best cases, individual actions set up by the DIRECCTE with companies are done in partnership with CARSAT (for its skills in conducting the risk assessment) and the occupational health services (to raise awareness of professional risks and their impact on health). Labour inspectors' roles are not limited

to monitoring compliance; they coordinate actors and facilitate meetings, among other things, because they have greater room for manoeuvre than their partners in activating networks. From experience, labour inspectors know the various actors by sector of activity and, for example, are able to direct the employer to funders they have identified. This collaboration between various intermediaries here — CARSAT, SIST and the labour inspectorate — is not formalised. Nonetheless, it is considered very important for implementing an effective prevention approach, while the instability of the current context (regular changes of directives by politicians, injunctions to change geographical areas, successive reforms in labour inspection) makes it difficult to build long-lasting relations between actors (by sector).

Labour inspectors refer to the regulatory database on the INRS website if employers have to learn about prevention. Data on the Ministry of Labour intranet help the labour inspectorate to develop monitoring approaches adapted to the characteristics of MSEs by sharing experiences with other colleagues. However, they do not have specific tools for MSEs; they use other preventive documents provided by the ARACT, the ANACT or the INRS, which are popularised and well perceived. A tool called 'Make the point', for example, is used in MSEs; this questionnaire of 40 questions allows one to assess psychosocial risks and find ideas for prevention actions.

Individual initiatives for risk prevention often lead to the construction of various tools or programmes, which are then disseminated to companies, such as the employer-employee brochures on psychosocial risks (linked to a European approach), produced in collaboration with a regional insurer (CARSAT of Normandy). These actions can then be taken up and applied in other regions, sometimes at national level. Labour inspectors also use documents from other French-speaking countries such as Belgium and Canada (Quebec).

- **Additional information from interview with prevention engineer emphasising training of the insurer (MSA)**

Prevention engineers support labour inspectors' interventions about risk prevention, and particularly in cases of accidents at work. Recently, regional multidisciplinary units composed of lawyers and various technical experts on risks have been set up in the labour services of the DIRECCTE. They are a valuable aid for inspectors, and support them in their practice and in the field.

These prevention engineers usually have a specialisation in a particular risk, such as biological risk or asbestos, and sometimes accompany inspectors in their visits to the company. Their presence often facilitates discussions with the employer about the risks and the importance of protecting oneself. The actions carried out by the support unit are related to the kind of request. They can be collective or individual, and have various aspects such as training, accompaniment, advice or expertise.

Most of the actions taken in prevention are collective. A large proportion of enterprises in the agricultural sector are MSEs, which are generally far removed from the circle of prevention stakeholders, with fewer OSH resources and less information about it than the largest. Collective actions aim at encouraging the exchange of practices based on experience, with a resource-pooling approach about strategies and tools which are daily used by the participants. These actions require a lot of work because they are developed in the form of a project (participative approach and medium-/long-term objectives) with a training challenge. The interviewee explains that it is also important to enable companies to save time and replace the employees who participate in the training. The idea is to use this training time as a time of action ('training-action principle').

It is possible to reach a greater number of companies by building collective actions with trade associations. An example comes from the flax industry in two departments, where an inter-company commission (companies in this field have between 30 and 200 employees) was created that brings together various stakeholders (producers, suppliers, designers, and so on) to work on, for example, the standardisation of specific machines for flax crops. Another example, in the wood field, illustrates the cooperation of stakeholders to work out what tools could be put in place to meet regulations and improve prevention (to make DUER, the worksheet (*fiche chantier*), and so on), as well as supporting the organisation of training (to set up specific machine driver training, exchanges about professional practices, and so on).

Training has an important place because it makes it possible to make the work of the enterprise safe and therefore secure the economic survival of the company. This is a crucial point to talk about before

talking about safety and health at work in MSEs. There are still too little continuous training in the agricultural sector. Making work safe is a major challenge in MSEs. The interviewee gave an example about phyto-pharmaceutical products: 'it is possible to ask a farmer to stop using a product considered harmful to the environment and humans. But if this product allows him to ensure his harvest and thus relax the pressure from his banker, he will not take the risk by himself of stopping using the product. Even if he wants to change his professional practice, the risk must be taken with all the stakeholders, it's that simple!'

▪ Findings from the dialogue workshop

This section is based on data collected during the dialogue workshop, bringing together regulatory organisations and OSH advisors to discuss their role, function and practices in OSH among MSEs. They are institutional stakeholders, attached to the French OSH infrastructure (see Figure 3).

Regulatory organisations and OSH advisors are under the government's authority. They have different missions to fulfil. The CARSATs, the CRAMIF and the CNAMTS have both an advisory and a regulatory role, while the ANACT, the SISTs and the OPPBTP have only an advisory role.

In addition, their tasks vary according to their level of action (national or regional). The CNAMTS, the ANACT and the OPPBTP act at national level, while the CARSATs, the CRAMIF and the SISTs work at regional level.

At national level in France, the CNAMTS, the ANACT and the OPPBTP steer implementation of programmes relating to occupational health and safety, and in particular risk prevention in MSEs, on the basis of objectives set every 4 years in contracts signed with the French State. They mobilise the partners to put measures in place for improving occupational health and safety in the enterprises that are targeted, in the light of various criteria such as accident rate. In general, the actions are co-funded by the various partners who have signed the same agreement. In some cases, the intervening stakeholders are also involved in surveys on the enterprises to acquire a better understanding of their needs, and generic knowledge that is useful, before developing tools that are specific to each trade.

At regional level, the CARSATs, the CRAMIF and the SISTs implement collective actions for supporting the companies in producing their mandatory occupational risk assessment documents (DUs), with the collaboration of the trade associations in each sector of activity. They have also run training in risk prevention specifically for MSEs (*Pratic'prévention* and *Adapt'métier*). They assist enterprises individually with their own tools (*Préval* and *Maeva*), they raise awareness of risk prevention by sending out letters and newsletters (by email), and they make information available (mandatory notices and posters, practical datasheets and induction guides). They also act on initial training by supplying teaching tools to teaching staff (case study and training day) and by asking for occupational safety and health to be incorporated into the teaching guidelines and reference documents for courses for initial training qualifications.

The stakeholders in the SISTs also act to help create the risk assessment document with their own tools and to raise awareness in MSEs of risk prevention. The occupational physicians carry out medical examinations on the employees and advise the employers. At the request of the physician, the occupational risk prevention advisors intervene in the enterprise to help produce the enterprise datasheet (*fiche d'entreprise*). That document is mandatory, including for MSEs. It is signed by the occupational physician and may be demanded by the CARSAT and by the labour inspectorate.

3.1.2 Intermediaries

After the review of the role, function and practices of the institutional stakeholders in OSH improvement in MSEs, this section presents data collected among intermediaries. We first discuss the role and impact of trade associations, employers' organisations and trade unions before discussing the private insurance companies Klésia and Malakoff.

▪ **The trade associations: OPCA TS, AFT, IRIS-ST, CCI**

All these trade associations have social partners in their administrative committees. The OPCA TS has equal representation by employers and employees, while the AFT, the IRIS-ST and the CCIs are employer organisations. All these professional associations support and advise firms belonging to their trade, except the CCIs, which have rather a cross-cutting role of guidance on the creation or takeover of any establishment, which is not limited to one trade. They all receive public funding. It is, however, for different reasons and from different ministries: it is related to training for the AFT and the OPCA TS and to supporting craftsmen for the IRIS-ST, whereas the CCIs receive government support through the tax system.

These trade associations carry out actions to raise OSH awareness and to give information about risks depending on the various trades. They supply brochures on occupational health and safety, and ready-to-use documents to simplify the administrative formalities for company managers. The IRIS-ST also does studies and research work to better identify the needs of the enterprises. They participate in co-constructing training programmes, with, for example, in the road goods transport sector, a training module dedicated to risk prevention. The trade associations fund actions targeted on MSEs and the development of training courses. Some advisors from those associations go to the enterprises at their request to help them individually on OSH issues. The trade associations that took part in the dialogue workshop are each dedicated to one particular sector of activity: construction (IRIS-ST) and road transport (OPCA TS, AFT).

The IRIS-ST is a private organisation closely linked to an employer confederation of the construction sector (the CAPEB), which partially receives public funding. It has an approach adapted to each of the various trades (logistics, truck driving, and so on) considering their specificities and their constraints, by proposing simple, succinct and operational information on risk prevention, which in general MSEs prefer. It supports sharing of good practices and of experience between peers, awareness-raising actions, OSH memos and tools that are specific to this sector. The IRIS-ST underpins its action with several partnerships with other stakeholders (industrial companies, suppliers and manufacturers) in order to promote risk prevention messages.

In road transport, both the AFT and the OPCA TS focus specifically on the training theme. The AFT, a private association, develops a risk prevention training programme for managers and a prevention approach for advisors. An AFT prevention officer is now assigned to the task of supporting and advising MSEs in the Brittany region, in order to have a dedicated contact available at any time for companies in need. For its part, the OPCA TS, a public non-for-profit organisation, collects contributions from businesses and organises training. It has, for example, trained 90 advisors in risk prevention and they meet MSEs (70 % of the enterprises in the road transport sector employ fewer than 10 employees).

The CCIs are regional private organisations representing the interests of commercial and industrial enterprises. They have a more cross-cutting role in supporting businesses, mainly during the creation or takeover of an enterprise, so that the enterprise satisfies the requirements of the regulations. The sectors of activity vary depending on the regions and on their economic structures. There is a CCI in each French department. Their advisors support firms and organise collective actions. Their actions are related to sectors of activity, for example in the restaurant sector with their support to meet food hygiene standards or to develop the accessibility of the premises. The CCI advisors working with firms about prevention use, for example, OIRA (a tool used for assessing risks) and MAVImplant (a tool for assisting with fitting out or refitting workplaces).

Trade associations play an essential role in the development of partnerships by putting the enterprises in touch with other stakeholders who are resources for the enterprise, such as the CNAMTS, the INRS or the CARSATs. In order to pass on messages and information about OSH, they also collaborate with external stakeholders such as suppliers and manufacturers, who, while not being risk prevention and OSH specialists, nevertheless intervene in the enterprise. Numerous agreements have been signed between risk prevention advisors and trade associations in order to improve risk prevention in MSEs.

The INRS also relies on some of these trade organisations to disseminate its tools and disseminate good practices in prevention.

▪ The social partners

The UMIH, the FAGITH/GNI, the CAPEB and the OTRE are employer confederations, while the CGT and the CFE-CGC are trade unions. All these social partners are financed by the contributions of their members and public funding coming from the Ministry of Labour. The employer confederations that took part in the dialogue workshop are each dedicated to one particular sector of activity: construction (CAPEB), road transport (OTRE) and Horeca (UMIH, FAGITH/GNI). Employees' representatives are organised not by size of firm, but by trade sector. Their aim is to defend their rights. We observe in France a decline in the union movement. Trade unions (CGT, CFE-CGC) are concerned with saving employment and looking for respect for social rights (in the context of the socio-economic crisis) rather than searching for solutions to improve working conditions.

The CAPEB, a private employer confederation of the construction sector, took part actively in setting up the IRIS-ST (an innovation centre for simplified tools, trade by trade, for satisfying regulatory obligations). The CAPEB participates in the dialogue between tradesperson, employer and employee, through regional inter-professional trades commissions on which employers and employees are represented equally.

The OTRE, a private transport employer federation with 4,500 members of companies from the transport sector, responds to requests from MSEs both on an individual basis and on a collective basis; for example, it provides support on how to receive a labour inspector or when an appointment has to be made with an occupational physician about the work incapacity of an employee, as well as newsletters with a section on risk prevention and collective actions. The OTRE is funded by the contributions paid by its members and partially by public funds, such as the CAPEB and the UMIH (presented below).

The FAGITH/GNI, a professional association of the restaurant sector, makes companies aware of OSH and encourages them to use risk prevention tools such as OiRA and 'Stop wiping' (simplified financial aid for equipment that obviates the need to dry glasses manually in order to prevent the risks of cutting oneself and musculoskeletal disorders).

The UMIH, a private trade association in Horeca, is an intermediary that advises MSEs in the sector about the following tools: OiRA, 'Happiness at work' indicators (in partnership with ARACT) and 'Chodevant' ('Mind your backs' or 'Hot food coming through'), a tool for assisting in risk prevention.

The CGT and the CFE-CGC (French trade unions) engage in actions for their members, such as training about legal regulations (for the CHSCTs, for elected representatives and with an aid designed for apprentices) or about issues related to specific risks (for example psychosocial risks, nanomaterials and diesel fumes). In their opinion, the companies' lack of knowledge about regulations is considerable.

The employer confederations and the trade unions propose and carry out occupational safety and health training for their members, even though trade unions have very few members in microenterprises. The recent election of employees' representatives for microenterprises shows that 7 % of the salaried workforce participated in the vote (this represents 330,000 people of a total of 4,500,000 employees working in enterprises with fewer than 11 employees or self-employed)³.

Overall, the social partners support and assist managers with mandatory training (for the operating licence, for the training licence, health and hygiene training) that does not necessarily focus on OSH. They bring enterprises together for days to study risks (psychosocial risks, nanomaterials, diesel fumes, and so on) and pass on information about regulations, training programmes and actions, and about risk prevention, through newsletters and letters. They also maintain relations with training centres; for example, in the construction sector (building and civil engineering), they support lengthening of initial training in order to supplement it with certain themes and topics, and in particular occupational health and safety. The enterprises also contact them for legal assistance, but it is often in reaction to a problem that has arisen rather than as part of a prevention approach.

They collaborate with certain top-up health insurance funds (*mutuelles*) and with regulatory bodies such as the CNAMTS, the CARSATs and the OPPBTP. For example, assistance with producing the

³ Election in microenterprises: employees from microenterprises and self-employed workers voted. Available at: <https://travail-emploi.gouv.fr/archives/archives-presse/archives-communiqués-de-presse/article/elections-tpe-les-salariés-des-très-petites-entreprises-et-les-employés-a> (accessed April 2017).

occupational risk assessment document has been given in partnership with the CNAMTS in the Horeca sector.

▪ **Private insurance companies**

The data presented here were collected during interviews with representatives of two private insurance companies (Malakoff and Klésia).

Malakoff Médéric is a non-profit French social protection organisation. It offers pension, health and retirement benefits. This private insurance company considers that preventive actions need to be improved, especially in small businesses, since 95 % of their clients are micro-, small and medium-sized enterprises.

The prevention division now has 26 officers, many of whom are former salespersons who have been trained in prevention. Recently, the organisation has engaged external persons in order to broaden a multidisciplinary approach among the staff. Today, salespeople and officers of the prevention division usually work in pairs on the ground and that seems to have a more significant impact among companies.

This focus on prevention aims to limit the loss ratio in order to reduce the costs related to health damage in companies. It is also a way of differentiating itself in the market (commercial added value). It follows the win/win principle, whereby insurance and companies seek to avoid accidents and reduce their own spending related to health. Irrespective of the size of the enterprises, the aim of the insurance is to create programmes to help them:

- meet regulatory requirements;
- reduce absenteeism;
- improve the health of employees;
- help employees in difficulty (individual social actions).

In general, each programme is designed in three phases: diagnosis, actions and evaluation. Tools and partnerships with other prevention actors are developed according to these three phases. Then the group first develops diagnostic tools for companies by using internal resources, external consultants and certain institutional stakeholders (especially ANACT and INRS). In a second step, support strategies are developed to accompany the deployment of prevention actions over the long term.

The tools used are mainly devised and designed for large companies. They aim to raise awareness and identify the risks present in work situations within the company (helping to make the risk assessment document and update it), they serve to make a self-diagnosis of OSH legal obligations (with a questionnaire) and they contain indicators to assess the costs of absenteeism, as well as the health status of workers.

The insurer works exclusively with its customers (companies and individuals). It does not, for example, set up general campaigns in a particular sector. As advisors do not have the time to visit each client regularly, many online tools have been developed to help enterprises in their daily lives. Early feedback, however, raises a lack of assistance in the use of certain tools; some of the customers only partially use them and disconnect before they have finished. It is planned to set up a telephone number or online help (chat) to help people who are blocked during the use of the tool.

The organisation has carried out some specific studies to evaluate certain actions, but has not yet put in place an evaluation mechanism for its programmes. It works in partnership with a public institution of higher education, research and training for adults (the National Conservatory of Arts and Crafts) on a prevention assessment project. The interest of this project is also to be able to show concrete examples of prevention to convince customers about the benefits of having a preventive approach and to quote figures to support this.

The group Klésia manages pension provision as well as professional contingency fund and healthcare coverage, in order to supplement the benefits paid by the French social security regime. For example, it collects contributions, pays pensions, gives information and advises companies, employees and pensioners about their rights. It also supports its members, individual members as well as companies, with complementary welfare benefits and by meeting their needs arising from work-related disabilities or hospitalisation, and so on. It offers supplementary health cover for self-employed and employed people. Finally, it intervenes in situations related to disability in enterprises and for private individuals.

Examples were given in the road transport sector. Specifically concerning prevention, a large number of information actions are carried out: distribution of leaflets at home or during events, organisation of events on a health-related theme, awards and trophies for exemplary companies, flu vaccination campaigns with easy access and flexible schedules for employees.

Klésia also provides financial support for research into new technologies, and finances experiments such as the current setting up of a shared mission manager (called AFT prevention officer, see section 3.2.2) to support SMEs in implementing a real prevention approach. The group also helps employers' federations with subsidies.

To carry out their diverse actions, partnership agreements are established between Klésia and the main stakeholders of the sector, such as training organisations in each sector, trade unions and employers' organisations, as well as with key prevention stakeholders such as the AFT (for the road transport sector) and the CNAMTS. The partnership with the CNAMTS also allowed it to create links and to have exchanges with other stakeholders in prevention such as the health services (SISTs) and the INRS.

3.2 Specific OSH practices in MSEs

In France, four priority programmes concerning OSH in MSEs have been defined by national government institutions (for the period 2014-2017), depending on accident rates and on the possibilities of steering effective risk prevention dynamics: bricklayers, car repair, restaurants and road transport. Specific preventive action programmes have been set up for each of these sectors depending on their specificities. In the dialogue workshop, data about these programmes and the associated actions were mentioned in the three sectors considered: construction, transport and restaurant (that is catering). We here present findings about practices by sector of activity based on data collected during the dialogue workshop.

3.2.1 Practices in construction sector

In the construction sector, the tool that was cited most is the one for **incorporating risk prevention into initial training** (*Synergie* tool) and the one for incorporating it into the further training given by the OPPBTP, namely the IRIS-ST centre (e-learning aid). A prevention campaign entitled '100 minutes pour la vie' ('100 minutes for life') was launched in order to highlight the importance of risk prevention and avoiding occupational accidents. **Approaching risks on the basis of each particular trade and each particular type of risk** is already well developed in the construction sector with the tools created by the IRIS-ST, the CRAMIF and the CABEP. The IRIS-ST underpins its action with partnerships with other stakeholders (industrial companies, suppliers and manufacturers) to promote risk prevention messages. The SIST BTP (SIST in the construction sector) has designed an approach for encouraging the company manager to produce the mandatory single risk assessment document (DUER). A table for monitoring the enterprises (with accident rate scores being attributed) makes it possible to target certain enterprises for interviews combined with medical examinations, and for visits. For this purpose, the medical examination of the employees is combined with an interview with the company manager to talk about the DUER and the enterprise datasheet (*fiche d'entreprise*) during the same half-day at the occupational health service. This facilitates subsequently making an appointment to visit the company in order to fill in the enterprise datasheet. It was observed that the OPPBTP is moving towards more action for raising awareness of the safety culture. Up until 2015, various actions were conducted by that association with the enterprises: collective actions (assistance with the DUER), individual help with the *Préval* risk assessment tool, the *réseau CAP prévention* network of risk prevention correspondents, specific training for MSEs (*Pratic prevention*, *Adapt'métier*), making information available (pack, practical datasheets, induction guide) and an awareness-raising tool. In 2016, a survey on practices and difficulties related to the DUER, conducted in the construction sector (IRIS-ST, 2017), has been aiming to define actions for developing the risk prevention culture. Ideas for further developing on-line tools such as *Maeva*, *OiRA*, and so on have also been discussed.

3.2.2 Practices in road transport sector

In the road transport sector, the main tool cited was the **Synergie tool**. The MSE-specific actions in the transport sector relate to co-designing of training programmes by the AFT, by the CNAMTS and by Carcept prev (provident, pension and health insurance fund for the sector). A sector-level national agreement was signed between these three partners. The risk prevention training programme was developed for managers and prevention advisors, thanks to collaboration between INRS, the CNAMTS and the AFT. That training has been tested and is now being deployed nationally. The OPCA TS has trained 90 advisors in risk prevention who meet MSEs (70 % of businesses employ fewer than 10 employees). This training was given by the CARSATs, who also trained the SISTs on a tool for maintaining employees in their jobs. The CARSAT imparts both knowledge about risk prevention and also advice about the tools (for example OiRA), depending on the role of the partner. The CARSAT Sud-Est (CARSAT for South-East France) also brings companies together in a risk prevention club. The challenge is both to raise awareness in MSEs, by building a partnership between various institutions, and also to make MSEs capable of handling risk prevention by themselves. An AFT prevention officer, a job recently created to satisfy the obligation to appoint a competent employee, is a pooled resource who is made available to companies, and is assigned to the task of supporting and advising MSEs in the transport sector. This experience with an engaged OSH officer covering several companies is an experiment in progress and has recently started. INRS brochures about optional safety equipment on lorries are presented to dealers so that risk prevention is incorporated as far upstream as possible (purchase of vehicles by the companies, with safe equipment being proposed). The MAVImplant tool for car repair garages is presented by the French Bodywork Federation at trade fairs, in a monthly magazine, and during training or advice given to the enterprises. A technical assistant from that federation can help with using the tool. It was observed that company managers like the tool for visualising the surroundings and the locations of the equipment in three dimensions, but they do not often follow the simulation through to the end. They do not use the prevention part of the tool and rather use MAVImplant for visualising flows of materials and humans so that they can improve production and have a summary document for dialogue with the architect or the designer.

3.2.3 Practices in restaurant and hotel sector

In the restaurant sector, the main tool cited is the **OiRA on-line tool** for producing a document assessing the occupational risks present in the enterprise, and for drawing up a preventive action plan. Two funding assistance solutions for preventive measures can also be obtained in this sector:

- A national objectives agreement (*Convention Nationale d'Objectifs*) setting a specific preventive action programme in the hotel and traditional restaurant sector was signed in 2015 between the CNAMTS and the federations UMIH and FAGITH/GNI, so that the various state social funds for health insurance, pensions and other benefits (CARSAT, CRAM or CGSS) can establish **risk prevention contracts (contrats de prévention)**⁴. The various funds participate in funding the spending necessary to reach the set risk prevention objectives. The maximum contribution by the funds is EUR 50,000. It is given in the form of advances that can be transformed into subsidies if the terms of the contract are properly complied with.
- The 'Stop wiping' campaign (*stop essuyage*) is a simplified funding scheme (*aide financière simplifiée*) paid by the regional insurers (CARSATs) to fund the purchase of new glass-washers combined with reverse-osmosis systems. The objective of this measure is to reduce the number of cuts and the number of repetitive gestures by obviating the need to dry glasses by hand.

At the hotel trade fair in Paris, a workshop on risk prevention topics and on ergonomics encountered a lot of success with the public because it put people in a simulated environment with identified risks and allowed them to experience recreations of real situations. During the dialogue workshop, the idea was

⁴ The risk prevention contract allows one to obtain financial assistance for the achievement of prevention objectives. The contract is made between a regional fund and a company that has to subscribe to a national objectives agreement and a prevention programme specific to its branch of activity. A company can establish the contract when its trade association has signed a national agreement with the CNAMTS.

raised of doing a similar workshop at the annual restaurant trade fair, which is visited by a large proportion of restaurateurs.

3.3 Common understandings among and divergences between the stakeholders

The following findings are based on the data collected during the dialogue workshop.

Generally, all of the stakeholders agree about the importance of pooling their efforts, in particular the need to define more precisely the fields of action of each of them, and to develop better coordination between them for improving the consistency of their messages on risk prevention for MSEs.

The use of tools that are simple and easy to access is considered to be an important point for adapting to the needs of MSEs.

All intermediaries shared that a trade-by-trade approach, focusing on the occupational risks of each specific sector of activity, is important.

The term 'allied' stakeholder was used many times about stakeholders directly in contact with the MSEs, such as kitchen designers and fitting-out specialists, chartered accountants, suppliers and manufacturers. All of the interviewed stakeholders want to find partners who distribute risk prevention messages more widely and durably while reaching as many enterprises as possible.

Some intermediaries who are in regular contact with the enterprises (kitchen designers and accountants, for example) are sometimes governed by rationales that are more commercial than the desire to take on board OSH issues for the MSEs, for example a kitchen designer who fits equipment that does not comply with safety standards, or an accountant who produces the single risk assessment document (DUER) merely by ticking the boxes on an administrative form and then invoices for it without having done a risk assessment in the workplace. Company managers often use such stakeholders for lack of risk prevention intermediaries and because of their availability to give customised advice.

The social partners pointed out that there are some times when it is easier than at others to have access to the managers of MSEs and to propose risk prevention assistance, such as when a business is created or taken over. Incorporation of a risk prevention training module during the mandatory training course for creating an enterprise was indicated as a possibility for gaining access more rapidly to a larger number of enterprises.

Vocational training establishments and schools are also designated as places through which future employees have to go, but they lack the internal resources for giving risk prevention training, even though today's apprentices are tomorrow's entrepreneurs. Wearing cut-resistant gloves is, for example, a habit to get into while learning the trade and one that it is difficult for an older chef to get into. Initial training for future company managers is also considered to be an important lever for improving risk prevention, as is further vocational training, in order to instil a sustainable risk prevention approach in employees and employers.

The lack of availability of company managers, and the difficulties encountered in trying to contact them, are an obstacle that was frequently mentioned by all of the stakeholders. Various stakeholders mentioned that it is necessary to give careful thought to how ways can be found to have both employees and managers participate in the risk prevention actions that are proposed.

We observed few divergences between the various types of intermediaries. Two points are to be noted:

- The social partners consider that the regulations are unsuitable for MSEs, but that opinion is not shared by some regulatory organisations (the CNAMTS). Social partners think that there are too many laws in the French Labour Code and that they are not specific to MSEs. Regional stakeholders, who seem to be closer to MSEs and to know their situations better, think that the legislation is not adapted to MSEs. National stakeholders seem less aware of their difficulties in applying the laws.
- There are different interpretations of the use of the OiRA tool by MSEs. The CNAMTS considers that, in the restaurant sector, many restaurateurs who use the tool follow it through to the end, whereas the FAGITH/GNI (a trade association) indicates that the restaurateurs who use it do

not go through with implementing the actions proposed in the tool (which require delegation to an architect, or to another specialist).

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3.4 Obstacles to and facilitators of preventive action in MSEs

This deals with barriers and facilitators linked to the development of the OSH context in France, with data collected during the interviews as well as in the dialogue workshops. The contextual factors are explored for each sector of activity (construction, road transport and Horeca) and at the level of the enterprise (in MSEs).

3.4.1 Contextual factors

In France, the financial crisis has led to significant cuts in public service budgets. Thus, the number of occupational physicians, labour inspectors and CARSAT advisors that were covering the needs of companies in terms of prevention has sharply decreased. Labour inspectors, being less numerous, do not have the time to go to MSEs and they tend rather to make inspection visits in larger companies (with more than 50 employees and a CHSCT). CARSAT advisors, who are also less numerous, tend to work in companies where there are already known health problems (accidents at work, high rates of occupational diseases). Finally, occupational physicians have refocused on medical visits and they delegate part of their tasks, to occupational nurses who provide medical supervision and to external occupational risk experts who visit firms (risk assessment, advice to the employer, safety data sheet, and so on).

Overall, fewer preventive counsellors (labour inspectors, CARSAT advisors and occupational physicians) lead to more corrective measures than preventive actions. The prevention system in France is therefore deteriorating. A compensation for deregulation is the emergence of new trades (for example ergonomist or psychologist in occupational health services) and the need to collaborate with new partners, which are closer to MSEs, such as professional associations, insurers and training organisations. We observed competition between the various stakeholders, who are increasingly numerous (public and private), offering many tools to companies, which are sometimes redundant. The number of insurance companies in the market has increased consequently to address the deficits of public bodies (lack of time and advisors).

Moreover, most of the private organisations in prevention receive public funds (depending on their missions, their actions, the sector of activity, and so on). Obtaining a certain amount from public funds remains a key objective for the survival of a private organisation, as does attracting more members to increase the number of contributions. Several factors might increase the competition among all these stakeholders seeking funding for their own organisations: a change in the law, public budget cuts, a smaller number of members, and so on. The recent reform of labour law, for example, has resulted in a spacing of medical visits every 5 years, instead of every 2 years. Consequently, private occupational health services (SISTs), financed by the contributions of member companies, had to raise their visibility and diversify their preventive actions among enterprises to keep in touch with them, because the obligation to call them for medical issues has been legally changed (decreased).

▪ Context of the construction sector: data from the dialogue workshop

The French construction sector has been affected by the economic crisis since 2010, with a decrease in the number and price of assignments. Today the economy is improving and new markets are developing, for example innovation in construction to reduce energy consumption and environmental impact. There are both business to business (B2B) and business to consumer (B2C) relationships with clients and markets. The B2B market has tough competition, competing on price, and the B2C market has medium competition where both price and quality are important. The construction sector employs many immigrants. The sector is also affected by competition from low-cost countries.

Micro-enterprises often do subcontracted work and the ordering party or the co-contractor can have considerable decision-making power over production, which has an impact on the working conditions in

the enterprise. Since the enterprises generally have no long-term outlooks on their order books, economic survival is a permanent priority, to the detriment of occupational health and safety.

The social partners emphasise that the accident rate is high in the construction sector and that employees are exposed to numerous risks, and yet the construction trades remain accessible to people who have no notion of risk prevention.

- **Context of the road transport sector: data from the dialogue workshop**

In road transport, the competitive market is not advantageous for employers who are dependent on suppliers. Furthermore, the main clients require time and demand quality. External factors related to economic developments (for example the price of fuel or the cost of goods) and the business market make the companies vulnerable. The transport sector is also changing. It seems that, in the future, vehicles will change from lorries to vans, because there are fewer obligations for vans and they have easier access to city centres. The explosion of online shopping requires small but regular deliveries with an increasing frequency of travel and fragmented working days. The employees in the transport sector seem less vulnerable than the enterprises. Employment remains stable. Workers can change employer easily. The employees often have years of seniority and a high level of professional experience.

Accident rates in the road transport sector are high and have led to risk prevention programmes being developed through an agreement signed between the OSH stakeholders and the organisations and bodies handling training in the sector (57 % of the road transport companies have 1-9 employees and 33 % have 10-49 employees, making 90 % of the companies in this sector MSEs). There are also other agreements for collective partner actions. Better coordination of the schemes would be desirable to help the MSEs in the sector to be better aware of the roles of everyone. The companies find it difficult to understand how the various stakeholders and their actions fit together (far too many contacts). Yet the existing schemes are complementary in the transport sector, with several stakeholders and several partnership agreements: co-designing of training programmes by the AFT, the CNAMTS and Carcept prev for OPCA TS advisors and company managers; and also other agreements, for example a regional agreement between the MEDEF, the CARSAT and the SIST that makes it possible to deploy actions annually in partnership and sets the action programmes of the CCI.

The MSEs in the transport sector are generally passive with regard to risk prevention. Regulations are a lever for raising their awareness of risk prevention, the idea being to go via intermediaries (trade association, equipment supplier or ordering party) to make the company manager aware of the risks. The institutional advisor stakeholders (CARSAT, SIST) are seen as inspectors rather than advisors. Training is an important avenue to investigate for education on risk prevention. MSEs with fewer than 10 employees should be targeted, as the group having the most needs (lack of knowledge of the regulations, high accident rate, and lack of time and of skills for doing risk prevention).

- **Context of the Horeca sector: data from the dialogue workshop**

In the Horeca sector, the average company lifetime of a restaurant is 7 years. Overall, employees are also in a vulnerable position, with low wages in low-skilled jobs. A large part of them are young workers and immigrants. Temporary and part-time employees are common, with a high number of seasonal workers or employees who work for short contracts or only on particular events. Employees who have worked less than 1 year seem to be more prone to accidents (60 % of the accidents). Restaurants have a majority of private customers (B2C), with high pressure on prices and a high level of competition.

The Horeca sector is a sector with specific constraints. Staff turnover is high and employees regularly change workplace, as the seasons change. The employees are described as being generally a young population, with low awareness of the risks related to their occupational activity. In addition, the risk prevention stakeholders are not fast enough in the context of the seasonal nature of the work. An example was given in the restaurant sector of a medical examination for a seasonal worker who started work in December and was seen by the physician in March, 2 weeks before the end of the employment contract.

In this sector, the measures supporting occupational safety are not always compatible with the hygiene standards to be complied with. Non-slip floor tiling was cited as an example, because it puts considerable

strains on employees' backs during daily cleaning. This floor is recommended to prevent falls but is harder to wash in order to respect the hygiene standards. However, the network of stakeholders established for assisting with and checking food hygiene are seen as being facilitators for getting the risk prevention message across to MSEs.

Finally, several stakeholders explained that the absence of communication between training institutions and MSEs was a problem. Young people are, for example, not trained in using cut-resistant gloves during their initial training, and consequently there is a gap between employer and employees, with managers not supplying the necessary equipment (in risk denial) and employees (young workers) not daring to ask for it. Communication about risks is therefore difficult to establish because of generational barriers (young/old), changes in approach when faced with the risks of the trade (denial/personal protective equipment) and the absence of communication about risk prevention between the various environments (catering school/enterprise).

▪ Context related to MSEs

MSEs are a target that it is not easy to reach. Firstly, there are a large number of small structures over a wide geographical area, making it impossible for risk prevention stakeholders to do customised monitoring for each establishment. Secondly, they do not have CHSCTs or works committees that could facilitate exchanges about occupational health and safety between the external stakeholders and the enterprise. The manager is mentioned as being a versatile and central (and therefore unavoidable) stakeholder in the small structure. Very often the company manager devotes a large portion of his or her time to administrative running of the enterprise, which is complex and it is even more difficult if he or she is running the enterprise alone. Furthermore, since the survival of the enterprise is what matters most, in particular economically, OSH is not a priority for most MSEs. Several different stakeholders in contact with MSEs described situations in which the employer is not fully aware of the risks present in his or her enterprise (denial) or else is stretched to the limit by his or her obligations as company manager. In addition, the low degree of formalisation of how MSEs are organised does not help stakeholders external to the company to act practically on internal practices.

According to some of the OSH stakeholders who intervene in the enterprises, it is not always self-evident how to establish relations with MSEs, and such relations are difficult to sustain over time. MSEs are generally distrustful of external stakeholders and remain very passive with regard to OSH.

3.4.2 Obstacles and facilitators reported by stakeholder group

Overall, all stakeholders during the dialogue workshops agreed about the fact that employers in MSEs often have difficulty identifying their roles and functions, which to some extent can be reinforced by the diverse risk prevention messages and practices given by the intermediaries.

In addition, tools are sometimes duplicated redundantly, which gives the impression they are reproducing the same thing even if they are in different forms (brochures, tables recapitulating the hazards sector by sector, and computer tools). However, the INRS website is designated as a resource because it centralises the information on risk prevention while also proposing tools that are easy to access and to use (OIRA, and the Synergie and MAVImplant tools) as well as specially adapted to the sector level. The Synergie tool, for example, is available for both construction and road transport: its content is designed according to the specificities of each sector, while the application remains the same across sectors. However, after using the tools, the employers do not generally have sufficient financial resources to have work done (changes in the organisation, improvements to the physical or the psychosocial environment in the workplaces), which is a real obstacle to practical implementation of risk prevention actions.

Other initiatives seeking to reach several enterprises at a time were described during the discussions. Collective workshops for raising awareness of occupational risks are organised for exchanging good practices and for sharing experience (for example between restaurant managers). In this way, the company manager feels less alone in coping with the difficulties he or she encounters in implementing risk prevention actions. However, such collective actions have their limitations: only a minority of employers are motivated to attend them and the employers must be referred by or members of the body or association that organises the activities in order to have access to these workshops. It is sometimes

difficult to be available on the date scheduled for the workshop, and ultimately the manager is still alone once he or she has returned to his or her enterprise, which does not facilitate implementing preventive actions in practice. There is a need for assistance out in the field, which is not possible with the lack of resources in terms of staff at the intermediaries (limited number of risk prevention advisors to provide customised assistance and monitoring for the MSEs).

The social partners and the trade associations highlighted the fact that, for employers in MSEs, OSH was not a priority. Risk preventers are seen more as control officers, and their role as advisors is generally unknown. They are up against a negative image of risk prevention, which is seen as an additional bureaucratic constraint by the enterprises. Enterprises go to the risk preventers after an inspection or after an accident.

In the following paragraphs, we present the barriers reported by each group of stakeholders in the dialogue workshop (regulatory organisations and OSH advisors, trade associations, social partners).

▪ **Regulatory organisations**

Regulatory organisations and OSH advisors highlighted the central role of MSE employers in risk prevention. They consider that collective prevention actions have to be implemented in MSEs and that further easy-to-use tools have to be developed. Establishing a unilateral approach to prevention is described as a solution to the difficulties of MSEs in understanding the great diversity of prevention stakeholders. It was further agreed that there is a need to develop OSH education in MSEs, at each level of the enterprise (from directors to apprentices). The coordination among stakeholders should be better supported by tools and regulations.

The main obstacles are to reach MSEs and to raise awareness about risk prevention, hence the development of programmes based on intermediaries such as professional associations (professional federations, chambers of commerce and industry, training organisations) as well as employers' and employees' representatives. They are facing both the diversity of the coordination of very heterogeneous stakeholders on the territory and the challenge of harmonising prevention practices at national level. Moreover, French law is complex and its implementation constitutes a barrier for MSEs. Another difficulty in relation to OSH policies and programmes is that the INRS cannot ensure the sustainability of its actions because it has to move from one programme to another. However, its objective is also to seek to develop the autonomy of MSEs in the implementation of evaluation and risk management.

The difficulties encountered by the DGT in carrying out measures to steer prevention with MSEs are first of all related to a lack of staff in the ministry. Given the low number of inspectors and the current directives of the DGT, the labour inspectors must broaden their missions to prevention, in addition to monitoring. The DGT relies on the regional labour inspectors (working in the DIRECCTEs) for the monitoring tasks and relies on other intermediaries for the prevention actions. As a consequence, inspections are managed by regional stakeholders. There is a difficulty in reaching MSEs and duplicating actions among regions, as well as a risk of taking indiscriminate actions not coordinated with all stakeholders. A regional steering network was therefore suggested by participants and interviewees.

A number of aspects related to the regulatory setting were reported in the interviews with the regional inspectors (DIRECCTEs). Restructuring and downsizing within the labour inspectorate (removal of secretarial positions) have profoundly changed the work of labour inspectors. Much of their working time is now devoted to administrative management, to the detriment of visits to companies. About 300 checks in enterprises are expected per labour inspector in an entire year, whereas in practice 100-120 interventions can be carried out and monitored. As the number of labour inspectors is limited, interventions are primarily aimed at those employing the greatest number of employees in order to reach more workers and to demonstrate their presence on the ground (political effects), which may partly explain the lower levels of contact MSEs. As the national context is changing, it is difficult to have sustainable actions in an unstable situation with frequent legal reforms (everything changes every 4 years) and the regular rezoning of sectors of activity. On the one hand, companies are struggling to keep pace with reforms and, on the other hand, the labour inspectorate reports a lack of training of managers on OSH regulatory aspects, which slows down the improvement of health and safety in MSEs.

The difficulties encountered by inspectors with MSEs relate mainly to a lack of training and information. Generally, the company is perfectly familiar with the production process but is unfamiliar with the

regulations and does not follow changes in them. As the employer does not know how to make the production processes and the equipment compliant, he or she will often call on external experts, who will sometimes cost him a lot of money, even though he or she may use in-house skills. An example was given of a vacuum-cleaning system, where the installers had not supplied the system reference values, then the manager was unable to follow the long-term development of the system's efficiency and finally this new system did not meet the conditions required by the regulations. Then, the only way for the employer to attain compliance was to have the file of reference values drawn up by an external expert, who will obviously invoice for it, even though it should have been integrated before in the specifications, without extra billing, as it is normally included in the installation costs.

Another obstacle related to a lack of information is that employees are generally unaware of the duty of confidentiality of the labour inspectorate and therefore do not dare to approach inspectors for fear of being forced to confront their employer about problem work situations. Even if inspectors have to intervene on collective work, they have the option of acting on the request of an individual. If the worker is dismissed, labour inspectors can no longer put in place actions and it will be for the industrial tribunal (*prud'hommes*) to manage the (individual) dispute between the employee and the employer.

On the other hand, intervention in small establishments is described as easier because it has fewer interlocutors than a large company and allows direct access to the legal representative (the employer). Having the opportunity to take time for a discussion with the manager helps to circumvent the first, often negative, reactions to an inspection and to explain the benefits of a prevention approach. If the manager does not cooperate during the visit, the inspector has to go through the drawing-up of minutes. He or she also knows that this procedure can last up to 3 or even 4 years before arriving at a judgment and that, during this time, the offence will persist in the company to the detriment of workers. He or she therefore prefers to make the employer listen to reason in order to consider concrete changes to support the health of the employees.

Since 2001, with the introduction of the obligation to make a risk assessment document, labour inspectors (from the DIRECCTEs) are more aware of prevention and collaborate with occupational health services (SISTs). Their role has evolved from purely inspection to support. In the last few years, prevention engineers, belonging to a unit of the DGT, have supported the inspectors during their intervention. Their presence often facilitates discussions with the employers about the risks and the importance of protecting themselves.

Partnership with occupational health services are an important lever for action. French companies have to fill out an information sheet about the enterprise (*fiche d'entreprise*) and it is a first step towards taking professional risks into account. The inspector may order that it has to be drafted with the assistance of the occupational physician. The latter then goes to the company to produce it and to help with the production of the risk assessment document.

Various collaborations have been reported, especially with the INRS (on designing the tool 'Make the point' about psychosocial risks), the regional offices (ARACTs) and insurers (CARSATs). Multidisciplinarity is a guarantee of efficiency: a message about prevention shared by all the actors and the labour inspectorate reinforces the implementation of a prevention approach. However, the network is mainly informal. Today, collaboration depends on individuals and is thus fragile over time. It should be noted that the national health labour plans (*plans santé travail*, established by the government since 2005) are supposed to create these networks, with a regional steering committee from regional organisations (intermediary actors), even if concretely the involvement of actors in the field is still missing.

There is little sharing of experiences between labour inspectors, and exchanges about practice are generally informal, as is the cooperation between the regional insurance CARSATs and the labour inspectorate, which varies greatly between regions and individuals. Inspectors usually have little opportunity to work with other interlocutors than the usual institutions (CARSAT, SIST, ARACT). The obligation of confidentiality and the obligation of neutrality of the labour inspectorate does not facilitate cooperation with some stakeholders.

Labour inspectors face difficulties in following up cases, in particular due to a lack of communication between the Ministry of Labour and the Ministry of Justice. Generally speaking, prosecutions are more successful against large companies than MSEs. When inspectors carry out a measure with legal consequences, they are often not informed of the outcome of their report. Three to four years may be

required before the case is dealt with. It often happens that the case is closed without prosecution, which in the end gives little consideration to the work done by the inspectors.

Interventions are made in the workplaces that are located in the geographical area to which the DIRECCTE belongs. Sometimes a company's head office is located in another region. In this case, the follow-up of cases by the inspector may also be more complicated because inspectors generally have few links with the justice agencies of other regions and are also not informed of the follow-up of the situations they report.

▪ **The trade associations**

Trade associations also reported that collective prevention actions have to be further developed, as well as easy-to-use tools and the OSH education of (future) workers and (future) directors in MSEs. The OSH network has to evolve, with new stakeholders (for example accountants) and better coordination between institutional stakeholders and intermediaries to meet MSEs' requests. It seems important to support the creation of MSEs' collective networks and to share common resources (such as the INRS web pages about trades). Changing perceptions of prevention amongst MSEs is also mentioned as a point to improve (today seen as an additional bureaucratic constraint).

▪ **The social partners**

The social partners also mentioned the need to better educate workers and employers about OSH. They consider that OSH tools and messages given by institutional stakeholders are redundant. There is a lack of coordination between stakeholders in the OSH infrastructure, and regional disparities. Private insurers are seen as emerging stakeholders who want to act in prevention and in MSEs.

At the MSE level, the social partners think that employers and workers are exposed to the same risks because employers have a protective attitude towards their employees: they expose themselves to hazardous work situations instead of letting their workers be exposed. The social partners also noted that behaviours and profiles of MSE employers have changed over the years: they have more expectations of trade organisations and the services that the organisations offer.

The social partners think that the regulatory tools can be incentives for MSEs to commit to risk prevention. According to them, it would be desirable to reduce the rate at which occupational accident and disease contributions are levied on MSEs, and to increase the amount that is allocated to simplified funding schemes for funding investment in risk prevention equipment.

Trade unions mentioned that they are rarely approached by trade associations and OSH stakeholders about OSH issues in MSEs.

▪ **Private insurance companies**

The difficulties encountered by the private insurance companies (as reported during the interviews) in conducting prevention steering activities among MSEs are the lack of time allotted to employees for training and the low level of knowledge in enterprises about general and specific prevention devices. For example in the transport sector, employers often drive for the company themselves. Therefore, they delegate administrative tasks to their spouses or call on external accountants. Owner-managers are consequently not aware of certain steps related to prevention devices or regulations. Another barrier is that numerous enterprises are not linked with trade unions, which are mainly established in large groups,

Digital tools are seen as helping to reach as many companies as possible, even if this method has limits, especially in small companies, where it is important to have a personalised message (related to the trade and the sector of activity) for the owner-managers. The funds allocated for preventive actions by the insurance companies are often used in large companies rather than MSEs.

In terms of needs, the insurance companies have identified that MSEs want simple devices to be installed, adapted to their specificities and with personalised support. However, the heterogeneity and distribution of small enterprises in the national territory is an obstacle to meeting these needs. The owner-managers of MSE are still identified as the main drivers of preventive actions.

- **Agricultural prevention engineer**

Sector-specific inputs were also provided in the interview with the agricultural prevention engineer. In the agriculture sector, companies know each other very well. The professional network is one of the first pillars that can be relied on to draw up prevention plans. Furthermore, professionals are more motivated when using a project approach. Strategically, it is also possible to reach MSEs through larger companies that are linked to them.

The public administration of the agricultural sector is unique (compared with other trade sectors) because it is built, at least in theory, as a single window, offering all services to its companies: a dedicated insurer (MSA), a dedicated Ministry of Agriculture, and so on. This configuration has advantages; for example, professional and prevention stakeholders can easily intervene in vocational education (managed under the same ministry), and it allows them to reach more people who will then work in small companies in the sector. National and regional plans make it possible to develop professional networks, but are still little invested in by the stakeholders in the field (mostly in large companies).

There is a lack of recognition of the existing know-how in MSEs, with a tendency to underestimate skills in small enterprises and to think that they have not been able to grow for lack of skills, resources, tools, and so on. Moreover, the stakeholders in companies have difficulty expressing what they know ('they do not know that they know how to do it'). However, small companies also respond to contractor and client requests, their management system can be exemplary, they have specific activities and competencies and they can be highly competent in their field, and up to date with new technologies.

It is also important to help MSEs save time. It is necessary to arrive with proposals that interest them (projects are generally well perceived), where it is possible to help employees take part or subsidise their attendance, and let them choose the times of the meetings (especially when there are fewer than 10 employees). The difficulties encountered by the agricultural MSEs are mainly linked to their modes of operation (and not to individuals). It is important to be able to go there, even if the presence of external people can worry them, much more than in a larger enterprise which is more accustomed to this type of intervention. The dissemination of information on OSH remains a difficult point to manage and evaluate in terms of impact.

3.4.3 The motivations and reasons (driving forces)

Generally, employers avoid soliciting the regional stakeholders such as the CARSATs and CRAMIF advisors for fear of attracting attention to their enterprise and of then being inspected by the labour inspectorate. However, the particular cases mentioned during the discussion show that those who do go to such stakeholders (CARSATs and CRAMIF) have quite a positive image of them, with staff being described as competent and as giving good advice.

Sometimes managers are personally motivated to put in place risk prevention initiatives in their establishments. For example, some employers produce their own brochures on risks and on the procedures to be complied with for newly hired employees in order to cope with the seasonal nature of work in the restaurant trade.

The initiatives described by the various stakeholders have, for the most part, impacts on their members only. Their broad coverage varies according to the type of actions and the specificities of the sector. Furthermore, it is often the people interested by the topic of risk prevention who mobilise themselves, which does not represent the majority of the restaurateurs. Succeeding in reaching a maximum number of enterprises does not seem possible without better coordination between the stakeholders.

4 Concluding remarks: what works for whom — and why?

The prevention approach towards MSE is not structured in a top-down manner and there is a need for better coordination among actors. The occupational health plan (PST) provides general guidelines but is implemented differently in different parts of the country. Thus, partnerships or innovations in the risk prevention field are very different among MSEs from one territory to another. Partnership agreements and tools for supporting enterprises are also heterogeneous. The approach follows a more bottom-up logic starting from local realities to steer prevention at the national level.

A multitude of tools and communication supports about risk prevention exist. They are sometimes redundant (a proven tool invented by a stakeholder is not reused by another actor). There is a loss of energy and efficiency; tools and specific knowledge about risks in each sector of activity are not pooled. There is also competition between different prevention organisations. Employers in MSE feel somewhat lost with the multiple actors involved in prevention. Each stakeholder's roles and tasks seem consequently complex to them.

Feedback about good practices does not really exist. There is a lack of analysis on the effectiveness of the actions implemented. The intermediaries are asking for more dialogue and exchanges between them. The coordination and steering of the different actions appear to be an important need, identified by the various stakeholders.

Furthermore, the three dimensions of prevention governance (regulation, incentives and information) co-exist among the stakeholders and supplement each other. The regulator's main role and mission are to assist companies in meeting regulatory requirements for occupational health and safety, such as the risk assessment or accident reporting. Inspections by these stakeholders appear to be a facilitator to get employers to deal with prevention, but can also be an obstacle to more general risk prevention based on continuous improvement of the OSH approach. Owner-managers find it hard to imagine that regulatory actors can have a counselling role to work with them on meeting regulatory requirements and are not only in an inspection role.

Simplified financial assistance by sector of activity is an incentive to support companies in the purchase of equipment or the redesign of workplaces in order to reduce the exposure risks for employees (for example kneading machines in bakeries and unloading docks in the transport of goods). Regulatory stakeholders have to manage these simplified financial aids (the CNAMTS makes a selection of the files that will be financed among MSEs) and advise companies on compiling these files (the CARSAT advisor or the prevention counsellor in the SiST). The other stakeholders, such as trade associations or employers' and employees' representatives, inform the employers about the existence of these simplified financial aids.

All stakeholders give a lot of information to companies on regulatory obligations, occupational risks and prevention actions. We note that OSH communication is more obvious to trade associations and employers' representatives, who are closer to MSEs and more often spontaneously asked by employers. Pamphlets, websites, attendance at trade shows, apprenticeship training and the trade press are various examples of the tools used to try to educate MSEs about occupational risks.

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