

Public consultation on the new EU occupational safety and health policy framework

You reply as -single choice reply-(compulsory)	on behalf of an organisation
Please indicate your organisation's name -open reply-(compulsory)	HOSPEEM - European Hospital and Healthcare Employers' Association
In which country are you and/or your organisation based? -open reply-(compulsory)	Brussels

Necessity and nature of a new EU OSH policy framework

Do you agree with the assessment of the EU OSH Strategy? Did it lead to tangible results? -open reply-(compulsory)

In order to improve workplace safety and health, do you consider it necessary to continue coordinating policies at EU level or is action at national level sufficient? -open reply-(compulsory)

YES, it is necessary to co-ordinate and monitor EU policies where this adds value. Implementation is for national and local level.

If you deem such a framework at EU level is necessary, explain why. Which aspects should be covered? -open reply-(compulsory)

Level of commitment

With respect to your answer to the above questions, is there a need for a new EU OSH Strategy or should alternative measure be considered? Please explain. -open reply-(compulsory)

- We support an EU approach which defines common strategic objectives, not specific and detailed ones. - By strategy we mean a broad framework which helps to coordinate actions in the different EU Members States and to have a full picture of the measures in place and of the improvements in the OSH area. - We also think that it essential for a possible new strategy to put in place a system to clearly assess the outcomes achieved as a result of the strategy. This is to assess the added value of having such a strategy. - A strong focus should be put at EU level on having a broad framework to share good practice and produce practical tools to help employers in the assessment and improvement of OSH actions. - No specific objective in the OSH area should be set.

If EU level action is necessary in order to improve workplace safety and health, do you consider it necessary to set broad goals and priorities and to coordinate national policies at EU level? -open reply-(compulsory)

- It can be helpful to set broad goals but not specific objectives as it is important to understand that health and safety actions have to be targeted on national situations, legislation, organisation and practice. No coordination of national policies at EU level, broad goals and priorities only. - We also need to be mindful of the difference in the starting point of each Member States. - Goals should inspire continuous improvements and encourage Member States to monitor improvements in both processes and outcomes.

What would be the added-value of including specific targets into a possible new EU OSH policy framework to measure progress in improving workplace safety and health in the EU? -open reply-(compulsory)

- Broad goals are helpful to be mindful of long term challenges and objectives to reach and motivate governments and social partners towards improvements - There would not be an added value in including specific targets as they could not be adapted to national situations/starting points and challenges specific to national settings

Should a new policy framework include a list of objectives, actions, calendars and actors involved in the implementation of actions or should it be limited to setting a vision for the future, and a definition of goals and priorities? -open reply-(compulsory)

An EU policy framework gives a positive signal to all stakeholders. It sets the overall direction, gives EU Member States a framework to

set appropriate targets and indicators to monitor improvements. Member States have to find the correct way to reach targets and implement policies. It is very important that in this process Member States put a strong focus on the identification of the relevant stakeholders and their responsibilities in contributing to both the formulation and the implementation of national occupational health and safety policies.

Content of a new EU OSH policy framework

What are the key challenges in the OSH area?

How would you prioritise them? -open reply-(compulsory)

- Creating ownership at national and local level. The relevant stakeholders at national and local level, in particular social partners, have to be consulted and involved by national governments both in the formulation and implementation of OSH actions. The sense of ownership by the different actors who have to implement and take forward the actions is fundamental to achieve the objectives set in the OSH area.
- Integration of occupational safety and health into education and training programmes. - Ageing workforce – how to keep staff healthy until retirement

What practical solutions do you suggest to address all or some of these challenges? -open reply-(compulsory)

- Create a broad framework at European level for coordination, monitoring and support from the European Commission to share good practice in the OSH area. - Support social partners at EU and national level in taking forward initiatives arisen from their assessment and initiative. Regarding the key challenge posed by the ageing workforce, it is worth mentioning the work done so far on this common priority by social partners at cross-sectoral and sectoral level.

Do you consider that such a framework should develop initiatives to provide further protection for vulnerable groups of workers and/or for workers in specific high risk sectors? -open reply-(compulsory)

Do you consider that measures for the simplification of the existing body of EU OSH legislation should be included in such a political instrument? If so, which ones would you suggest? -open reply-(compulsory)

- YES, measures for the simplification of the existing body of EU OSH legislation and encouragement of better management of health and safety risks are welcome. - Once implementation of existing regulations is reached, possible review of regulations on the basis of needs and challenges identified. - Taking into account the level of detail of the set of EU regulations already in place in the OSH field, we do not see the need for further regulation. The initiative should be left to social partners to identify challenges/problems, where they should arise, for them to agree on the best solution. As a good example, it is worth mentioning the work of cross-sectoral and sectoral social partners to address the challenges posed by the ageing workforce. Another very good example, also included in the final evaluation report of the EU OSH strategy 2007-2012, is Directive 2010/32/EU. - The EU Commission should support social partners' initiatives in the OSH field - In order to assess if new regulation is necessary, an impact study should be preliminarily carried out (short, medium and long term impact) in order to analyse costs and benefits. - Any new EU OSH regulation, if it is necessary (on the basis of a preliminary impact study), should ideally outline overarching principles and what is to be achieved rather than describing in detail how efforts are to be carried out. The "bottom line" should allow flexibility for more detailed and/or stringent provisions to be negotiated at national or local level by social partners in accordance with national legislation and practices. Therefore, if and where regulation is necessary, the model should shift from specific detailed regulation towards more framework regulation including monitoring and assessment of practice.

Do you think that such a framework should specifically identify and address the challenges posed by the ageing of the working population? If so, which measures would you suggest? -open reply-(compulsory)

No. This is an important challenge but needs to be addressed within the existing legislative and risk management framework. Emphasis should be placed on enforcing existing legislation and framework provisions.

What measures would you suggest to reduce the regulatory burden on SMEs and micro-enterprises, including reducing compliance costs and administrative burden, while ensuring a high level of compliance with OSH legislation by SMEs and micro-enterprises? -open reply-(compulsory)

Do you have any views on the role of social dialogue at EU and national level to the identification, preparation and implementation of any new initiatives to improve health and safety at work? -open reply-(compulsory)

- Yes, priority should be given to social partner initiatives (e.g. Directive 2010/32/EU, also included as one of the achievements in the

framework of the OSH strategy 2007-2012 in the final evaluation report) rather than detailed regulation on specific topics. - Social partners are in the best position to understand the “real” issues which affect workers and employers on a daily basis. They are therefore in a strong position to know what will and will not work in practice at the workplace. They are well placed to decide which principles or standards should be applied, and what can be interpreted flexibly depending on local practice. - EU legislation in the OSH area does already have a great level of detail. Further EU regulation may lead to restrictions of the opportunities to tailor actions in this field to the national peculiarities. Furthermore the compulsory transposition and implementation of further EU regulation in this area could also lead to higher implementation costs and unnecessary administrative burdens and workload, lengthening the time needed to achieve the objectives. At European level, in line with the principle of self-regulation which inspires the EU social dialogue, on top of existing OSH legislation there are also cross-sectoral and sectoral agreements between EU social partners in place that regulate or offer a policy framework to deal with issues in the OSH area that are peculiar to the different sectors (e.g. Directive 2010/32/EU). - This model also respects the principle of subsidiarity and of Member States' competence in appropriate areas, whilst respecting minimum European standards.

Add any further aspects that in your view were not sufficiently taken into account by the above questions? -open reply-
(compulsory)

Only EU framework, no detailed regulations.
