Management systems approach and national programmes on occupational safety and health (OSH)

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A management systems approach

One of the main pillars for the Global Strategy on Occupational Safety and Health (OSH) adopted by the International Labour Conference in 2003 (full text available at http://www.ilo.org/public/english/protection/safework/globstrat_e.pdf) is the application of a management systems approach to OSH at the national level. A model for such an approach at the enterprise level has been described in the ILO Guidelines on occupational safety and health management systems (ILO-OSH 2001). As suggested in the Global Strategy on OSH, the application of this management systems approach at the national level, as proposed below, builds on this concept and related methodology. This approach at the national level is the core element of the new instruments on promotional framework for OSH which is briefly discussed at the end of this paper.

At the enterprise level

The systems approach to the management of OSH at the enterprise level provided in the ILO Guidelines on occupational safety and health management systems (ILO-OSH 2001) is based on the concept of continual improvement of performance through the application of the PDCA cycle (“plan-do-check-act”). The Guidelines include five sections, namely Policy, Organizing, Planning and implementation, Evaluation, and Action for improvement.

• “Policy” is the basis of the OSH management system and sets the direction for the organization to follow.
• “Organizing” provides guidance on management structures and the allocation of responsibility and accountability for delivering the policy.
• “Planning and implementation” gives guidance on initial review, system planning, development and implementation, OSH objectives and risk control.
• “Evaluation” describes how to monitor and measure performance and carry out audits and reviews, identifying areas for improvement.
• “Action for improvement” addresses arrangements for taking preventive and corrective action and for continual improvement of performance through various measures.

These Guidelines have been successfully applied at enterprise level in many countries. In the following section, an attempt is made to describe a model for a management systems approach to OSH at the national level.

At the national level

Based on the above, the main steps in developing such a management approach at the national level include the following:

• Firstly, national policy on OSH should be formulated in consultation

Table 1. Comparison of the main elements of a management systems approach to OSH at the enterprise and national levels

<table>
<thead>
<tr>
<th>Enterprise level</th>
<th>National level</th>
</tr>
</thead>
<tbody>
<tr>
<td>Setting OSH policy within the enterprise</td>
<td>Setting national policy on OSH</td>
</tr>
<tr>
<td>Establishing organization and responsibilities within the enterprise</td>
<td>Establishing and progressively developing a national system for OSH</td>
</tr>
<tr>
<td>Planning and implementing the elements of an OSH management system</td>
<td>Formulating and implementing national programmes on OSH</td>
</tr>
<tr>
<td>Evaluating and reviewing performance within the enterprise</td>
<td>Reviewing national programmes on OSH</td>
</tr>
<tr>
<td>Taking action for continual improvement</td>
<td>Formulating new national programmes on OSH for continual improvement</td>
</tr>
</tbody>
</table>
with representative organizations of employers and workers, as laid down in the Occupational Safety and Health Convention, 1981 (No. 155). Other concerned parties may also be consulted as appropriate.

- Secondly, a national system for OSH should be developed which contains the infrastructure to implement the policy and national programmes on OSH.
- Thirdly, a national programme on OSH should be developed, based on the analysis of the OSH situation, which preferably should be summarized as a national profile on OSH, and implemented over a specific period of time.
- Finally, at its conclusion, such a programme should be reviewed, and be replaced by a new national programme on OSH.

Table 1 compares the main elements of a systems approach at the enterprise and national levels.

**National systems for OSH**

National systems for OSH are infrastructures which provide the main framework for the implementation of national programmes on OSH. In turn, one of the main aims of national programmes on OSH should be to strengthen national systems for OSH.

For the competent authority, it is not enough just to establish OSH legislation and to make arrangements for its enforcement. While tripartite collaboration, inspection and enforcement are still vital components of any national system for OSH, there is a need to develop other elements of the system covering specific functions – either within or in collaboration with key players such as labour inspectorates. For example, most employers, particularly those of small enterprises, need various supports just to comply with the legislation, such as providing OSH training to workers handling hazardous substances, conducting technical inspection of dangerous machines and carrying out medical surveillance. Further support and services are required to promote good practice covering many other aspects of OSH, which are outside the legal sphere. Although national systems for OSH can vary from one country to another, they should have many elements in common. These could include:

- laws, regulations, collective agreements or any other relevant instrument on occupational safety and health
- authority or body, or authorities or bodies responsible for OSH, designated in accordance with national law and practice
- mechanisms for ensuring compliance with national laws and regulations, including systems of inspection
- arrangements to promote, at the level of the undertaking, cooperation between management, workers and their representatives as an essential element of workplace-related prevention measures
- information and advisory services on OSH
- the provision of occupational safety and health training
- occupational health services in accordance with national law and practice
- research on OSH
- the mechanism for the collection and analysis of data on occupational accidents and diseases, taking into account relevant ILO instruments
- provisions for collaboration with relevant insurance schemes covering occupational accidents and diseases, and
- support mechanisms for a progressive improvement of occupational safety and health conditions in micro-, small- and medium-sized enterprises.

**Placing OSH high on national political agendas**

A major challenge in the Global Strategy on OSH is the call to place OSH high on national political agendas. There is general agreement that the protection of workers is of great importance and that OSH is a priority issue, but it is a fact that OSH has not been given sufficient attention in practice in many countries. The Global Strategy refers to the adoption of national programmes on OSH as a means to solve this problem by stating that “the endorsement and launching of a national programme on OSH by the highest government authority, for example, by the Head of State, government or parliament, would have a significant impact on strengthening national OSH capacities and mobilization of national and international resources.”

Several national programmes on OSH launched in recent years by member States have, in fact, been signed or endorsed by parliament, deputy prime ministers or other high authorities in national governments.

**National programmes on OSH**

A key element in making a management systems approach operational at the national level is the formulation and development of national programmes on OSH. These programmes are strategic programmes with predetermined time frame (e.g. lasting five years) that focus on specific national priorities for OSH, based on analyses of the situations in the countries concerned. These should preferably be summarized as national profiles on OSH. Each programme should be developed and implemented following tripartite consultation between government, employers and workers, and endorsed by the highest government authorities. While such programmes need clear objectives, targets and indicators, overall they should also aim to strengthen the national systems for OSH to ensure sustainability of improvements and to build and maintain a national preventive safety and health culture.

National programmes on OSH should be developed taking into account ILO instruments on OSH. For each Member, the instruments to take into account include, in the first instance, ratified ILO Conventions. In terms of a progressive improvement of national systems for OSH, the target should be the effective implementation of the relevant up-to-date Conventions and Recommendations, as well as of other instruments, such as codes of practice and guidelines adopted in this area. Furthermore, member States should also take into account future OSH instruments that may be developed.

A conceptual diagram of the strategy for strengthening national systems for OSH through national programmes on OSH is shown in Figure 1.

In order to ensure a coherent and effective use of scarce resources and to coordinate efforts better, the development of a national programme on OSH should include a number of logical steps:

- national tripartite agreement to establish a national programme on OSH
- establishment of coordination mechanisms for the elaboration and implementation of the programme
- preparation of a national profile on OSH
- analysis and identification of strong and weak points in the national systems for OSH, using the national profile on OSH
- identification of priorities for national action to improve OSH
- development of action plans in a national programme on OSH, including indicators of success
- launch of the national programme on OSH with the endorsement of the highest national authorities (to ensure OSH is placed high on national agendas)
• establishment of sustainable mechanisms for review, updating of data and continual improvements in effectiveness, and
• eventual designation of new priorities for action through the establishment of a new national programme on OSH based on an updated national profile on OSH.

National profiles on OSH
Once the government, employers and workers reach a consensus to formulate a national programme on OSH, the first technical step is to carry out a review of the national OSH situation. In order to carry out this review systematically, the preparation of a national profile on OSH is suggested. A national profile on OSH summarizes the existing OSH situation, including national data on occupational accidents and diseases, high-risk industries and occupations, and the description of national systems and capacity for OSH. National profiles on OSH also facilitate a systematic review of the improvements in national systems for OSH and programmes.

A national profile on OSH should:
• be prepared at the country level through a process that involves all the national competent and other designated authorities concerned with the various aspects of OSH, and more importantly the most representative organizations of employers and workers
• include basic data on all the parameters that may affect the sound management of OSH, at both the national and enterprise levels, including available legislative framework, enforcement and implementation mechanisms and infrastructures, workforce distribution, human and financial resources devoted to OSH, OSH initiatives at the enterprise level and level of protection
• provide practical information on ongoing activities at the country level (e.g. activities related to the implementation of international agreements, ongoing and planned technical assistance projects)
• enable a country to identify gaps in and needs for further development of existing legal, institutional, administrative and technical infrastructure related to the sound management of OSH, taking into account relevant ILO Conventions, Recommendations and codes of practice
• provide a means for improved coordination among all parties interested in OSH. The process of preparing the profile itself may serve as a starting point for improved coordination and should facilitate communications and an improved understanding of the potential problems and activities being undertaken within the country.

ILO technical cooperation and assistance for national programmes on OSH
The Global Strategy also highlighted the importance of providing technical advisory and financial support to, in particular, developing countries and countries in transition for the timely strengthening of their national OSH capacities and programmes. Priority should be given to countries where the assistance is most needed and where the commitment for sustained action is obvious. The launch of national programmes on OSH was mentioned as one example of demonstrating national commitment. Properly formulated national programmes on OSH have clear priorities for action based on tripartite consultation and a review of the national OSH situation. Thus, technical cooperation activities to support the implementation of national programmes on OSH have ensured success in view of their relevance and sustainability. While the launch of national programmes on OSH is a good criterion for providing technical and financial support, many developing countries require technical support in formulating a national programme on OSH. Thus, the formulation of a national programme on OSH could be an area for ILO technical cooperation if there is a tripartite commitment to OSH in the country.
Promotional Framework for OSH

The International Labour Conference, held in June 2005, had the first discussion on the elaboration of new instrument on promotional framework for OSH based on the guidance provided by the Global Strategy on OSH. After an extensive debate, the Conference Committee selected a Convention accompanied by a Recommendation as the form of the instrument. Proposed Convention is a new type of Convention with the focus of promoting OSH as suggested by the Global Strategy on OSH with the objectives of placing OSH high at national agenda and promoting preventive safety and health culture and systems approach at the national level. The design concept of the new Convention includes 1) promotional, 2) easy to ratify, 3) non-prescriptive, 4) avoid duplication with provisions of existing OSH instruments, 5) promote application of existing OSH instruments, 6) target continuous improvement of national OSH system and performance. The report of the Conference Committee is available at http://www.ilo.org/public/english/standards/relm/ilc/ilc93/pdf/pr-18.pdf. In June 2006, the International Labour Conference will have the second discussion to adopt a new Convention and a Recommendation on promotional framework on OSH. Active participation of all ILO constituents is essential in elaborating effective and practical promotional framework for OSH.

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Challenges in development of labour inspection systems

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The Kenyan labour inspection system has two separate inspection branches: namely, the industrial relations branch which deals with working hours, wages, terms and conditions of work; and the occupational health and safety branch which deals with the health, safety and welfare at workplaces. The topic of this article is the systems as they relate to occupational health and safety.

The department responsible for occupational health and safety inspection is the Directorate of Occupational Health and Safety Services within the Ministry of Labour and Human Resources Development. It has five divisions: i) field services and the specialized divisions for ii) occupational hygiene, iii) safety, iv) occupational health, and v) information & training. Occupational health and safety undertake different types of inspections, as needed: e.g. on request due to a complaint or accident, or a routine inspection. Routine inspections follow an annual work plan and set targets. The inspections normally seek to identify contraventions against the provisions of the Factories and Other Places of Work Act, Chapter 514, laws of Kenya.

Challenges faced by the inspection system

The Factories and Other Places of Work Act makes the employers responsible for ensuring that the work environment is safe and without risks to employees’ health. In the traditional approach, which has been practised for a long time, the occupier of the factory primarily waits for the government inspector to inspect and point out the contraventions against the law, sometimes requiring that the occupier is taken to court before any tangible improvements are made. If no inspector shows up, the workplace safety improvements implemented by the employer are usually very basic, if any. This reactive approach has proved ineffective over time – hence the need for change, for the following reasons.

1) The industrial activity has expanded over time, but the number of inspectors needed to conduct regularly inspections of every site has remained low. This situation has been worsened by the structural adjustment reforms that require lean government service. Under a situation of this kind, it may take years before an enterprise is inspected.

2) The officers rely primarily on government-provided transport when exercising their duty. Due to financial constraints, governments have not been able to provide the necessary adequate transport. Even if there were an increase in the number of officers, a significant rise in inspections would not take place unless adequate transport facilities were made available.

3) It is recognized that the clients require appropriately trained officers who are competent in identifying hazards and offering practicable solutions. However, training opportunities have thinned out, particularly from the nineties onwards, as there was over-reliance on donor assistance, which is very little nowadays. This situation makes it even more difficult for the government to offer