

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)	TEHY RY (Union of Health and Social Care Professionals)
In which country are you and/or your organisation based? -open reply-(compulsory)	In Finland

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**)

Yes we do. It seems that incidence of accidents at work has reduce during 2010-2012. Also occupational diseases have decreased between of 2007 - 2010. We believe that the strategy has raise awareness of good practice and increase national social dialogue. Also it has influence to better implementation of EU regulatory framework on occupational safety and health into national level.

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**)

It is very important to continue coordinating policies at EU level. A dialogue between the EU and national level stresses the importance of workplace safety and health in different policies of member states and in theirs legislation.

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

It should be covered a range level of different aspects within workplace safety could be raised (for examples risk assessment tools, prevention, good practice of management and leadership). Please look at the answer number 2 also.

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**)

Yes, there is need for new EU level Strategy. EU OSH Strategy has a strong influence to highlight the importance of workplace safety and occupational health aspects in member states.

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**)

Workplace safety could be established with different aspects and actions. It will be more effective to focus one or few aspects at once. Then it will be possible to argue these aspects better and deeper (many different actors can share, use and have benefit this kind of information) Also it is easier to make some action plans and evaluate them.

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**)

- to improve work environment, especially healthy buildings and good indoor air - to develop tools and risk assessment to prevent violence and harassment in working life - to address good and safety practice to handling heavy loads by hands, especially among women´s work

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**)

It should be include both sides; a vision and some priorities and actions. It is easier to work for the vision with some steps and actions into you concentrate at once.

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)

- How to handle and decrease musculoskeletal disorders and mental health problems - Violence and harassment are increasing issues in service sector - Carrying or moving heavy loads by hands, especially in social and health sector - Indoor air problems, caused by moisture damage and limited ventilation (increasing problem especially for workers in public buildings as hospitals, schools, kindercartens) - to promote safety aspects in case when an individual works alone in patient's home in social and health care (home care)

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

Prevention of musculoskeletal disorders can address by EU level regulation (to make a limit how much you can lift by hands). Also some mental problems and costs of sick leaves by them could be solved by develop good practice of management.

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)

Yes, decide the limit how much you can lift or move by hands and making actions to prevent violation and harassment in social and health sector. The inclusion of disabled persons into work is important, as is the adaptation of their tasks and working environment to their abilities. Also ageing workforce and how to promote their abilities to carry on work longer should be on focus.

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)

No comments for EU OSH legislation. But at national level can be developed more flexible legislation to contribute alternatives to work part time when individual's ability to work is decreased.

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)

Yes. More flexible working life should be developed, alternative solutions for working times and individual's choice to organize own work are needed. Also easy access to rehabilitation should be promoted.

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)

If the micro-enterprises so wishes, it could be possible to extend the transition period when they adopt new OSH legislation.

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)

Latest good work has been done in collaboration with partners of social dialogue about implementation of Directive 2010/32/EU on the prevention of sharps injuries in the hospital and health care sector. This work has been done at EU and national level and by this collaboration are produced new guidelines of good and more safety practice for work places.

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

Without EU level occupational safety and health policy framework it will be easy to forget or play down the importance of occupational health and safety aspects at national level. It is easier to promote these aspects when you have information and agreements from EU level to share. The present economic situation and lack of money in many European countries can lead to neglect safety aspects in working life. This makes the importance of European framework even more fundamental.