Contribution ID: 6c5eaac3-7959-448f-a296-3f36d70a85d6

Date: 22/02/2021 15:11:13

Public consultation on EU Strategic Framework on Health and Safety at Work

mandatory.

Introduction

The aim of this open public consultation is to take stock of the quality and implementation of the Strategic Framework on Health and Safety at Work 2014-2020 and to receive input for the future Strategic Framework 2021-2027.

For further information, we kindly refer you to the current Strategic Framework, which can be accessed in your own language **here.**

This open public consultation will be available for 12 weeks from 7 December to 1 March 2021.

About you

Hungarian

Irish

Italian

Latvian

*1	la contica da	
*Language of my contri	bution	
Bulgarian		
Croatian		
Czech		
Danish		
Dutch		
English		
Estonian		
Finnish		
French		
German		
Greek		

Lithuanian
Maltese
Polish
Portuguese
Romanian
Slovak
Slovenian
Spanish
Swedish
*I am giving my contribution as
Academic/research institution
Business association
Company/business organisation
Consumer organisation
EU citizen
Environmental organisation
Non-EU citizen
Non-governmental organisation (NGO)
Public authority
Trade union
Other
*First name
Francesca
*Surname
Cattarin
*Email (this won't be published)
francesca.cattarin@aeip.net
*Organisation name
255 character(s) maximum

The European Association of Paritarian Institutions (AEIP)	
ganisation size	
8 M (1 - 2 - 1 - 1 - 1 - 1 - 1 - 1 - 1 - 1 -	

- * Org
 - Micro (1 to 9 employees)
 - Small (10 to 49 employees)
 - Medium (50 to 249 employees)
 - Large (250 or more)

Transparency register number

255 character(s) maximum

Check if your organisation is on the transparency register. It's a voluntary database for organisations seeking to influence EU decision-making.

69133399372-91

*Country of origin

Please add your country of o	rigin, or that of your organia	sation.	
Afghanistan	Djibouti	Libya	Saint Martin
Åland Islands	Dominica	Liechtenstein	Saint Pierre
			and Miquelon
Albania	Dominican	Lithuania	Saint Vincent
	Republic		and the
			Grenadines
Algeria	Ecuador	Luxembourg	Samoa
American	Egypt	Macau	San Marino
Samoa			
Andorra	El Salvador	Madagascar	São Tomé and
			Príncipe
Angola	Equatorial	Malawi	Saudi Arabia
	Guinea		
Anguilla	Eritrea	Malaysia	Senegal
Antarctica	Estonia	Maldives	Serbia
Antigua and	Eswatini	Mali	Seychelles
Barbuda			
Argentina	Ethiopia	Malta	Sierra Leone

Armenia	Falkland Islands	MarshallIslands	Singapore
Aruba	Faroe Islands	Martinique	Sint Maarten
Australia	Fiji	Mauritania	Slovakia
Austria	Finland	Mauritius	Slovenia
Azerbaijan	France	Mayotte	Solomon
			Islands
Bahamas	French Guiana	Mexico	Somalia
Bahrain	French	Micronesia	South Africa
	Polynesia		
Bangladesh	French	Moldova	South Georgia
	Southern and		and the South
	Antarctic Lands		Sandwich
			Islands
Barbados	Gabon	Monaco	South Korea
Belarus	Georgia	Mongolia	South Sudan
Belgium	Germany	Montenegro	Spain
Belize	Ghana	Montserrat	Sri Lanka
Benin	Gibraltar	Morocco	Sudan
Bermuda	Greece	Mozambique	Suriname
Bhutan	Greenland	Myanmar	Svalbard and
		/Burma	Jan Mayen
Bolivia	Grenada	Namibia	Sweden
Bonaire Saint	Guadeloupe	Nauru	Switzerland
Eustatius and			
Saba	© Cuam	Nonel	O Cymin
Bosnia and Herzegovina	Guam	Nepal	Syria
Botswana	Guatemala	Netherlands	Taiwan
Bouvet Island	Guernsey	New Caledonia	Tajikistan
Brazil	Guinea	New Zealand	Tanzania
British Indian	Guinea-Bissau	Nicaragua	Thailand
Ocean Territory	Gamba Bioda	. Hodi agaa	. Hanaria
British Virgin	Guyana	Niger	The Gambia
Islands	•	Č	

	Brunei		Haiti		Nigeria		Timor-Leste
	Bulgaria	0	Heard Island and McDonald	0	Niue	0	Togo
<u></u>	D 1: E		Islands	0	N. C. II. I. I.	0	T
	Burkina Faso		Honduras		Norfolk Island		Tokelau -
	Burundi		Hong Kong		Northern		Tonga
	0 1 "				Mariana Islands		T · · · · · · · · · · · · · · · · · · ·
	Cambodia		Hungary		North Korea		Trinidad and
(A)	0	0	laalaad	(C)	N I a with	0	Tobago
	Cameroon		Iceland		North Macedonia		Tunisia
(C)	Canada	0	India	0		0	Turkey
0	Canada Cana Varda	0	India Indonesia	0	Norway	0	Turkey Turkmenistan
0	Cape Verde	0		0	Oman Pakistan	0	Turks and
	Cayman Islands		Iran		Pakisian		Caicos Islands
0	Central African	0	Iraa	0	Palau	0	Tuvalu
	Republic		Iraq		i alau		Tuvalu
0	Chad	0	Ireland	0	Palestine	0	Uganda
0	Chile	0	Isle of Man	0	Panama	0	Ukraine
0	China	0	Israel	0	Papua New	0	United Arab
	Omna		131401		Guinea		Emirates
0	Christmas	0	Italy	0	Paraguay	0	United
	Island		,		· araguay		Kingdom
0	Clipperton	0	Jamaica		Peru		United States
0	Cocos (Keeling)	0	Japan		Philippines	0	United States
	Islands		•				Minor Outlying
							Islands
0	Colombia		Jersey		Pitcairn Islands		Uruguay
	Comoros		Jordan		Poland		US Virgin
							Islands
0	Congo		Kazakhstan		Portugal		Uzbekistan
	Cook Islands		Kenya		Puerto Rico		Vanuatu
0	Costa Rica	0	Kiribati		Qatar		Vatican City
0	Côte d'Ivoire		Kosovo		Réunion		Venezuela
0	Croatia		Kuwait		Romania		Vietnam

Cuba	Kyrgyzstan	Russia	Wallis and
			Futuna
Curação	Laos	Rwanda	Western
			Sahara
Cyprus	Latvia	Saint	Yemen
		Barthélemy	
Czechia	Lebanon	Saint Helena	Zambia
		Ascension and	
		Tristan da	
		Cunha	
Democratic	Lesotho	Saint Kitts and	Zimbabwe
Republic of the		Nevis	
Congo			
Denmark	Liberia	Saint Lucia	

The Commission will publish all contributions to this public consultation. You can choose whether you would prefer to have your details published or to remain anonymous when your contribution is published. Fo r the purpose of transparency, the type of respondent (for example, 'business association, 'consumer association', 'EU citizen') country of origin, organisation name and size, and its transparency register number, are always published. Your e-mail address will never be published. Opt in to select the privacy option that best suits you. Privacy options default based on the type of respondent selected

*Contribution publication privacy settings

The Commission will publish the responses to this public consultation. You can choose whether you would like your details to be made public or to remain anonymous.

Anonymous

Only organisation details are published: The type of respondent that you responded to this consultation as, the name of the organisation on whose behalf you reply as well as its transparency number, its size, its country of origin and your contribution will be published as received. Your name will not be published. Please do not include any personal data in the contribution itself if you want to remain anonymous.

Public

Organisation details and respondent details are published: The type of respondent that you responded to this consultation as, the name of the organisation on whose behalf you reply as well as its transparency number, its size, its country of origin and your contribution will be published. Your name will also be published.

I agree with the personal data protection provisions

GENERAL VIEWS ON OCCUPATIONAL SAFETY AND HEALTH

The EU Strategic Framework on Health and Safety at Work 2014-2020 supports the promotion of high standards for occupational safety and health both within the EU and internationally. It aims to address the major health and safety at work challenges facing the EU through the implementation of a range of different actions at national and EU level. For more information, please see the Framework itself, which can be accessed in your own language **here**.

In this section, we are interested to understand your level of engagement with the existing EU Strategic Framework on Health and Safety at Work 2014-2020 and hear your views on how the situation within your country and/or the EU has changed since 2014.

Are you involved in or do you contribute to the design and/or implementation of occupational safety and health (OSH) policy, legislation and/or other measures? Please select what best applies to you.

- Yes, at EU level
- Yes at national or sub-national (regional, municipal) level
- Yes, I/my organisation are involved in OSH policy and/or legislation implementation in the workplace
- Yes, in another capacity
- No, not at any level

If chosen "Yes, in another capacity" please specify:

AEIP promotes the paritarian social protection schemes, which are schemes jointly established and managed by employers and trade unions on the basis of collective agreements. AEIP members provide different social protection services, such as pension, healthcare and paid holidays schemes. Many of them operate in the construction sector, hence are also responsible for providing training on health and safety as well as insurances in the case of accidents at work. Therefore, AEIP's members contribute to design and implement OSHA policy at national and sub-national level, while AEIP ensures that their demands are translated into policy actions at EU level.

Please answer the survey from your own perspective – for example based on the situation in your company, your country or, if you deal with occupational safety and health (OSH) issues at EU level, based on the situation in the EU as a whole.

Thinking about the situation in your country / the EU, has workplace safety and health in your opinion become better since 2014?

- Strongly Agree
- Agree
- Neither Agree nor Disagree

- Strongly Disagree
- Don't know

Please specify why:

500 character(s) maximum

As of 2014, new regulations and directive were adopted, at EU and national level. For example, in 2014 the French assembly adopted a regulation to foster health and safety at work and more recently, in December 2020, social partners signed a national agreement on occupational health and safety to better integrate this at the workplace. While this is not necessarily a qualitative indicator, it certainly confirms the increasing attention and efforts to improve working conditions at the workplaces.

Do you agree or disagree that sufficient action has been taken since 2014 to ensure high level of protection of workers' health and safety by...

	Strongly Agree	Agree	Neither Agree nor Disagree	Disagree	Strongly Disagree	Don' t know
the European Parliament and the Council	0	0	•	0	0	0
the European Commission	0	•	0	0	0	0
national or regional authorities (ministries of employment, national institute for occupational safety and health (OSH), labour inspectorate, etc.)	0	•	•	0	0	0
employers	0	•	0	0	0	0
employers' organisations at EU level	0	0	0	0	0	•
employers' organisations at national level	0	0	0	0	0	•
workers	0	0	•	0	0	0
workers' organisations (trade unions, etc.) at EU level	0	0	0	0	0	•
workers' organisations (trade unions, etc.) at national level	0	•	0	0	0	0

- *How familiar are you with the EU Strategic Framework on Health and Safety at work 2014-2020?
 - Very familiar (I know it in detail)
 - Somewhat familiar (I know certain aspects)

Not familiar (or only to a very limited degree)

In your opinion, how important are the following priorities of the EU OSH Strategic Framework 2014-2020 in relation to the key occupational safety and health (OSH) issues faced in your country / the EU since 2014:

	Very Important	Important	Slightly Important	Not Important	Don' t know
Better coordinate EU and international efforts to address OSH and engage with international organisations	0	0	•	0	0
Simplify existing OSH legislation	•	0	0	0	0
Address health and safety issues, such as the ageing of the workforce, emerging new risks, prevention of work-related and occupational diseases	•	0	0	0	0
Further consolidate national OSH strategies, aligning them with the EU OSH Strategic Framework	0	0	•	•	0
Better enforcement of OSH legislation by EU Member States	0	0	0	0	•
Facilitate compliance with OSH legislation, particularly by micro and small enterprises	•	0	0	0	0
Improve statistical data collection and develop the information base on work related diseases and health issues	•	•	0	0	0

OVERALL OPINIONS AND VIEWS ON THE FUTURE OSH STRATEGIC FRAMEWORK

In this section, we are keen to understand your views on what should be included in a new EU Strategic Framework on Health and Safety at Work. This includes questions around key challenges and objectives that should be addressed, the type of actions which should be included and what the main priorities of such a policy initiative should be.

In your view, did the EU Strategic Framework on Health and Safety at Work 2014-2020 contribute to improved health and safety at work at...

	To a great extent	Somewhat	Very little	Not at all	Don't know
EU level?	0	•	0	0	0
national level?	0	•	0	0	0

regional level?	©	©	0	•	0
the workplace (for example in your organisation)?	0	0	•	0	0

Please briefly explain why you believe the EU Strategic Framework on Health and Safety at Work 2014-2020 contributed – or not – to improved health and safety at work.

500 character(s) maximum

Having read the EU Framework for the purpose of this consultation, stakeholders who operate at national level remarked an alignment bewteen the national objectives and those embedded in the Framework. However, they could not tell whether the EU framework effectively influenced the national process or if this was the mere result of national bargaining.

Thinking ahead to the next 7 years (2021-2027), how important do you think the following will be in terms of OSH policy and action at EU level to be included in a Strategic Framework?

	Important	Slightly Important	Not Important	Don' t know
Promoting cooperation and coordination of OSH policies across policy areas, such as health, education, environment, chemicals etc.	0	•	0	0
Supporting enforcement activities	•	0	0	0
Development and dissemination of OSH guidance, good practices and other awareness raising activities	0	•	0	0
Updating and adapting OSH related legislation	•	0	0	0
International cooperation and coordination of OSH policy	0	•	0	0
Effective application of OSH legislation	0	0	•	0
Promoting social dialogue	0	•	0	0

In your view, has the Covid-19 pandemic increased or decreased the importance of any of the following OSH-related issues...

	Significantly Increased	Slightly Increased	Neither Increased not Decreased	Slightly Decreased	Significantly Decreased	Don' t know
infectious disease prevention measures in the workplace, including where risk of infection is higher or in essential services	•	0	0	0	0	0
increase of teleworking / remote working / working from home and prevention of related risks	•	0	0	0	0	0
work-related psycho-social risks / ergonomic risks prevention	•	0	0	0	0	0
access to OSH related information	0	0	•	0	0	0
coordination among Member States in tackling the COVID-19 pandemic at the workplace	0	0	0	0	0	•
effective OSH measures for vulnerable groups of workers, such as seasonal, migrant, temporary or self-employed workers	0	0	0	•	0	0
enforcement issues	•	0	0	0	0	0

Thinking about the future (the next seven years), do you think a new EU Strategic Framework on Health and Safety at Work and its priorities should...

- remain broadly the same
- be fundamentally changed/adapted
- other
- be updated/adapted
- be discarded there is no need for an EU-level OSH Framework

If chosen "Other" please specify:

infectious diseases)

500 character(s) maximum

AEIP supports the structure of the current Framewore, so we believe that it should remain broadly the same. Yet, we would like to suggest including measures aimed at promoting the use of digital technology and increasing the sharing of OSHA-related data. This would be particularly useful for occupationnal provident schemes, which could better target their services to employers and employees. Overall, the Framework itself should recognize the role that such schemes can play in OSHA strategies.

Thinking ahead to the next 7 years (2021-2027): What are the key challenges that are common across the EU and require further OSH policy action? Please select up to four answers.

t most 4 choice(s)
Risks from dangerous substances (e.g. chemicals / carcinogens)
Promotion of international OSH policy collaboration dimension
OSH risks emerging from ICT/digitalisation (increased digitalisation, AI,
workers' surveillance, right to disconnect)
OSH risks emerging from the rise of platform economy (gig-work, increased
precarious and atypical work)
Preparedness for future threats to workers' health and safety (e.g. infectious
diseases)
Increased working from home / teleworking
■ OSH risks emerging from robotics/automation/new technologies
Ergonomic risks and musculoskeletal disorders (MSDs)
Other
Psychosocial risks (increased work intensity, blurring of work-private life, etc.)
OSH risks to specific socio-demographic groups (women, migrants, etc.)
OSH risks emerging from nanotechnology/nanomaterials
OSH risks emerging from climate and environmental change (such as

What practical solutions do you suggest to address all or some of these key challenges?

2500 character(s) maximum

Today, OSHA policies are mainly managed at national level, where the state has a predominant role in designing and implementing the strategy related to occupational risks and prevention. Private occupational schemes are often neither consulted nor involved sufficiently in the process, despite the huge contribution they bring in this policy domain. In the case of paritarian provident funds, the untapped potential is even greater. In fact, by operating at sectorial and/or company level, these schemes have a deep knowledge of the main risks that characterize a sector and/or a company, therefore are in the position to provide targeted solutions both to employers and employees. Involving them would therefore have the twofold benefit of increasing the efficacy of OSHA policies and that of supporting the state in its mission. Hence, the first practical solution is to ensure a better inclusion of paritarian occupational schemes in the design and implementation process of the OSHA strategy. The European Commission should invite Member States to put in place such collaboration between the public and private stakeholders, namely between the state and occupational schemes. This would smooth the current silos-approach at national level, facilitate a collaboration and would result in a win-win situation for policy-makers, employers and employee. To this end, the European Commission should have a greater consideration of these schemes, which are often insufficiently recognized and, what is more, incorrectly compared to for-profit insurers providers. As a consequence, given that paritarian schemes are jointly established and managed by employers' organizations and trade unions, the second suggestion would be to strengthen the social value and re-affirm social bargaining as a fundamental process to elaborate public policies (including OSHA). Finally, as anticipated above, policy-makers should invest more financial resources to the deployment of digital services and better involve occupational schemes in the management of OSHA data. The management of data, and in particular the flow of these data between the schemes and the employers.

How important do you think it is that a new EU Strategic Framework on Health and Safety at Work covering the next seven years contributes to...

	Very Important	Important	Slightly Important	Not Important	Don' t know
ensuring evidence-based policy	•	0	0	0	0
anticipating and managing change for better and longer working lives	•	0	0	0	0
improving the application of EU rules	0	0	•	0	0
promoting higher occupational safety and health standards in the world	0	0	•	0	0
preventing work-related diseases and accidents	0	0	0	0	•
improving OSH strategies at national level?	•	0	0	0	0

Should a new EU Strategic Framework on Health and Safety at Work define in detail a list of objectives, actions, timelines and actors involved in the implementation of such actions, or should it set a vision for the future, and a definition of goals and priorities?

- Define in detail a list of objectives, actions, timelines and actors involved in the implementation of such actions
- Set a vision for the future, and a definition of goals and priorities
- Don't know

In your view, what main issues should be included in the successor to the current EU OSH Strategic Framework, covering the next seven years?

2500 character(s) maximum

The new OSH Strategic Framework should consider the impact that psychosocial factors have on work-related illnesses. While such factors are perhaps less evident that the physical ones, they have a huge impact on the professional performance of workers as well as on their personal life. Mental health requires protection especially in the new forms of work (e.g. platform workers, gig economy) and professional realities (smart/teleworking).

In fact, if on the one hand these forms of work might allow more flexibilities, on the other hand they blur the line between the professional and the personal life of workers. Therefore, the new framework should focus on the right to disconnect and on the prevention of psychosocial risks such as anxiety and stress. This will be particularly important in light of the pandemic and the consequences it will have on our economies and societies. Loss of job and/or income are in fact often associated with increased depression, low-self-esteem and anxiety, which may lead to higher rates of mental disorders and even suicides.

You may share any additional remarks or statement(s) regarding the topic of this public consultation here.

NB: Remember to remove any personal information from these documents in case you have opted for publication of your contributions in an anonymised way.

500 d	character(s) maximum				

Contact

EMPL-OPC-STRATEGIC-FRAMEWORK@ec.europa.eu