Occupational safety and health management in the context of corporate social responsibility

SAFETY MANAGEMENT

One of the basic aspects of Corporate Social Responsibility is the occupational safety and health policy, which is in turn one of the parameters most used by companies to gauge their progress in this matter.

By RAFAEL SALINAS GARRIDO. Occupational Safety Technician. FREMAP.

In the field of the prevention of occupational risks "socially responsible" companies are those that introduce an authentic preventive culture into their organisation across the board, taking into account the opinions of all stakeholders in this matter.

Corporate Social Responsibility, looking inwards from the firm, should be largely worker centred. Occupational safety and health, as one of the questions most affecting it, should be seen not as an investment in human resources but rather as one of the employer’s duties in the interests of improving the quality of life in the company.

Many are the institutions and bodies in recent years that have held up corporate responsibility as one of the keystones of the new business culture, while many companies are putting this theory into practice. Criteria and codes of conduct have come hot off the press to guide companies in the implementation of socially responsible policies, including the aspects of occupational safety and health to be taken on board.

Back in 2001 the European Commission Green Paper “Promoting a European Framework for Corporate Social Responsibility” told us that the traditional health and safety procedure, based on legislation and enforcement measures, had to change in line with the current trend of outsourcing work to contractors and suppliers. It also pointed to the need of "measuring", "documenting" and "communicating" the efforts being made in this field.

Social Accountability International’s SA8000: 2001 standard provides a framework for measuring a firm’s compliance with social responsibility/accountability requisites. It is a perfectly auditable and certifiable standard that can take in and embrace all known schemes already set up under ISO and OHSAS standards. But the SA8000 goes even further, certifying that social responsibility is being properly stewarded by the management and thus ensuring that all international rules on human rights are being complied with as well as the standards on quality, the environment and occupational health and safety.

This standard identifies a series of social responsibility requisites and the elements to be included in its management systems for implementation and assessment of business performance in occupational safety and health. The most important of these...
components are the establishment of a safe and healthy environment, involvement of senior management, worker access to preventive information and training, the establishment of risk-detection and -prevention systems with elimination of potential risks and maintenance of the firm’s hygienic and healthy conditions on the basis of a suitable business policy.

The Spanish Ethical Management System standard SGE 21:2005 is broader in scope than SA8000, taking an ethical approach to all company management aspects, not only those bound up with working conditions. It takes in all stakeholders, including nine areas: senior management, clients, suppliers, human resources, environment, investors, competition and competent authorities.

As regards the prevention of occupational risks the standard makes an explicit reference to occupational safety in several of its areas, for example the assessment and selection of suppliers and subcontractors. In the area of human resources it stipulates that "the company will pursue a suitable policy to guarantee the health and safety of its workers and also compliance with provisions on the prevention of occupational risks".

Lastly, we should point out that the SGE 21:2005 standard ensures compatibility with the certifications of other management systems such as ISO 9000, ISO 14000 and OHSAS 18001, enabling it to be grafted onto the business management system.

As well as these standards, mention should also be made of initiatives such as the GRI (Global Reporting Initiative), also called the triple bottom line report since it evaluates economic, social and environmental performance. This is fast becoming one of the most important CSR initiatives at worldwide level, especially for CSR reporting purposes.

The GRI Sustainability Reporting Guidelines, of voluntary use, give us a range of management indicators for assessing the firm’s performance in the field of occupational safety and health and social responsibility. We will come back to this later.

A model for the management of occupational safety and health should go further than mere legal compliance and help to improve the CSR-based management system. It would then be based on the following criteria:

- **Legal system.** Prevention Act and the regulations developing it.
- **British Standard Institute and collaborating bodies.** OHSAS 18001:2007 standard.
- **The GRI Sustainability Reporting Guidelines.**
- **Standard UNE 66177:2005 Management systems: Guide for integration of management systems.**

**The Spanish Legal System**

Since the coming into force of the Occupational Risks Prevention Act 31/1995 (*Ley de Prevención de Riesgos Laborales*) and of the preventive mechanisms developed therein and complementary standards, a high level of merely formal compliance with established obligations has been observed, together with over bureaucratisation in application of the standards and a certain degree of inefficiency in terms of achieving the objectives laid down in the law.

On some occasions the following misconceptions have been detected:
• a) That prevention management boils down merely to outsourcing the risk prevention services to a specialist firm that then carries out the activity and draws up the legally required reports. This obviously hinders the integration of prevention into the firm’s general organisation.

• b) That the fundamental obligation imposed by the new legislation is that of keeping on hand certain documentation (on risk assessment, prevention planning, etc) for presentation to the competent authority. The preparation of this documentation is therefore the essential reason for outsourcing risk prevention.

The upshot is that preventive activity in many Spanish firms is still inchoate and piecemeal.

The Law for Reforming the Legislative Framework of the Prevention of Occupational Risks 54/2003 (Ley de Reforma del Marco Normativo de Prevención de Riesgos Laborales) has been passed precisely with the objective (among others) of reinforcing the aforementioned integration process. One of the first legal obligations it lays down is that of setting up a structured Management System of Occupational Risks Prevention, which it calls Occupational Risks Prevention Plan. This should include, among others:

- Policy
- Organisational structure
- Responsibilities
- Functions
- Practices
- Procedures
- Processes
- Recourses

In short it lays down the guidelines for the Prevention Management System, on the basis of some management indicators.

**ILO Guidelines on Occupational Safety and Health Management Systems**

In June 2001 the International Labour Organisation published the final report of a Meeting of Experts held in Geneva from 19 to 27 April of that year to draw up guidelines on occupational safety and health management systems: ILO-OSH 2001

These guidelines on occupational safety and health management systems lay down the following basic requisites for such systems:

1. Policy, including worker participation.
2. Organisation, responsibility, competence and capacity building. Documentation of the safety management system and communication.
3. Planning and implementation, including the initial review, checks, occupational safety and health objectives, hazard prevention, prevention and control measures, management of change, emergency prevention, preparedness and response, procurement and contracting.
4. Evaluation: performance monitoring and measurement, investigation of work-related injuries, audit, management review, action for improvement, preventive and corrective action and continual improvement.

**OHSAS System (Occupational Health and Safety Assessment Series)**
A set of organisations led by British Standard Institute, the national standards body of the UK, published the specifications OHSAS 18001:1999 “Occupational Health and Safety Management Systems” and OHSAS 18002:2000 “Occupational health and safety management systems — Guidelines for the implementation of OHSAS 18001”.

These specifications have been drawn up in response to the growing demand for a standard for assessment and certification of prevention of occupational risks management systems and as guide to the implementation of said standard.

In July 2007 the OHSAS 18001:2007 standard was published to bring the system into line with the standards ISO 9001:2000 (Quality management systems) and ISO 14001:2004 (Environmental management systems), thereby helping organisations to integrate their systems of environmental management, quality management and prevention of occupational risks management.

The OHSAS 18001:2007 standard, which practically coincides on 5 points with the standard ISO 14001, takes a succinct and imperative tone, making it more useful for auditing purposes.

The OHSAS 18000 standards aim to lay down systematically a series of requisites for implementing an occupational health and safety management system, enabling firms to formulate specific objectives and policies associated with this matter, considering legal requisites and information on risks inherent to their activity.

These standards seek to ensure improvement of workplace health and safety, doing so by means of systematic and structured management and in relation to all stakeholders.

Why do we incline for the standard OHSAS 18001.2007?

- It allows recognition or certification.
- It calls for legislative compliance of the country of application.
- It goes further than the protection of the organisation’s employees, taking in suppliers, visitors, clients and stakeholders.
- It gives us management tools not provided by ruling legislation.
- It calls for a self-control management and auditing system.
- It favours management with a corporate responsibility approach.

**GRI Sustainability Reporting Guidelines**

The social dimension of sustainability is bound up with the impacts of an organisation’s activities on the social systems in which it operates.

One of the main social responsibilities of any company is “to respect human rights, providing decent working conditions that favour occupational safety and health and the human and professional development of the workers”

To measure progress towards sustainable development we need to create sustainability performance indicators.

The GRI model is a guideline for the organisation to describe by means of sustainability reports the results of adopting and applying codes, policies and management systems.

A useful comparison might be made between the OHSAS 18001:2007 standard and the requirements of the GRI
Sustainability Reporting Guidelines, mostly taken from the social performance indicators. The main points are summed up below:

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<tr>
<th>OHSAS 18001</th>
<th>GRI SUSTAINABILITY REPORTING GUIDELINES</th>
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<tr>
<td><strong>1. Policy</strong></td>
<td>• Policy has to include continual improvement and legislative compliance, in a document of the public domain addressed to the organisation</td>
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<td>• Organisation-wide policy (or policies) that define the organisation’s overall commitment related to the Labour Aspects, or state where this can be found in the public domain, indicating their linkage to internationally recognised standards</td>
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<td><strong>2. Planning for hazard identification and risk-control assessment</strong></td>
<td>• Prevention procedure for identification, assessment and registration of preventive aspects, including the preventive activities that might affect all staff and the personnel of subcontractors and visitors.</td>
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<td>• Procedure for monitoring and measuring corrective and preventive action, both of the reporting organisation and upstream along the supply chain.</td>
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<td><strong>3. Legal requisites and others</strong></td>
<td>• Procedure for identifying and meeting legal requisites and others that might be applicable, communicating them to interested parties.</td>
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<tr>
<td></td>
<td>• Universal Declaration on Human Rights.</td>
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<td></td>
<td>• International Covenant on Economic, Social and Cultural Rights.</td>
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<td>• International Covenant on Civil and Political Rights.</td>
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<td></td>
<td>• ILO Tripartite Declaration of Principles concerning Multinational Enterprises and Social Policy.</td>
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<td>• Vienna Declaration.</td>
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<td><strong>4. Objectives and Programmes</strong></td>
<td>• The organisation is bound to establish and keep to documented and quantified occupational</td>
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<td>• Organisation-wide goals regarding performance relevant to the Labour Aspects, indicating their linkage to the internationally</td>
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risk prevention objectives for each important level and function within the organisation.

- When the organisation establishes and reviews its objectives, it shall consider the legal requisites and others, the risks and hazards in occupational risk prevention, its technological possibilities, its operational financial requisites as well as the points of view of interested parties.

5. Structure and Responsibilities

- The organisation has to define, document and communicate the functional responsibilities and authority of the personnel that manage, perform and check the activities that affect the risks to be prevented, relating them to the organisation’s activities, facilities and processes, with the purpose of managing occupational risk prevention.

- Designate a member of the management with the defined responsibility for guaranteeing that the occupational risk prevention management system is recognized universal standards.

- Identification of the highest post with operational responsibility on labour aspects and the distribution of operational responsibility at senior management level.
6. Consultation and Communication

- The organisation has to set up the necessary procedures for ensuring that the pertinent occupational risk prevention information is duly exchanged and communicated between employees and other interested parties.
- Employees have to be involved in the development of risk management procedures and policies and also have to be consulted on any change affecting risk prevention in the work station.
- Point 4.4 of the Guide runs as follows: “Informing and consulting employees about the working relationships with formal representation bodies such as organization level work councils. (Indicators LA6 and LA9).”

7. Training, awareness-raising and competence

- The organisation has to establish and keep to procedures that guarantee that all employees in every function and at all levels have received occupational risk prevention training.
- Specify the training and awareness-raising procedures in relation to labour aspects. (Indicators LA8, LA10, LA11 and LA12).

8. Performance

- The
- Procedure for
organisation has to establish and keep to procedures for regular monitoring and measuring of occupational risk prevention performance, doing so by using active and reactive, quantitative and qualitative measures and data recording.

9. Accidents, incidents, non-conformities and corrective and preventive action

- The organisation has to establish and keep to procedures for defining the responsibility and authority for dealing with and investigating accidents, incidents and non-conformities; and also to take actions to mitigate any consequence arising therefrom.

- **Indicator LA7** calls for records to be kept of occupational diseases, lost days and absenteeism, etc.

10. Audit

- The organisation has to establish and keep to a programme of audits and procedures for carrying out periodic audits of the occupational risk prevention management system, with the aim of determining whether said system is compatible with the OHSAS standard, with the firm’s policy and objectives and of furnishing management with information on

- The organisation has to account for certifications for prevention management systems, or other approaches to auditing/verification procedures used by the reporting organization and its supply chain.
FINAL CONCLUSIONS

1. The implementation of an occupational risk prevention management system should be a voluntary commitment by the organisation on the grounds that the control of occupational risks by setting up such a system has been amply proven to have positive economic knock-on effects and also notable legal and ethical benefits.

2. The OHSAS 18001:2007 standard ensures continual improvement in managerial performance by integrating prevention across the board throughout the whole organisation and using improvement methodologies, tools and activities.

3. It helps organisations to abide by occupational risk prevention legislation. Implementation of an occupational risk prevention management system does not of itself ensure law abidance. Nonetheless, it does provide mechanisms for identifying the legal provisions affecting the firm and keeping continually abreast of their changes.

4. External promotion of the company. It promotes the company’s image among its clients, society, the government, demonstrating the organisation’s commitment to the health and safety of its workers, in those cases in which the company opts for certification of its system. An occupational risk prevention management system projects to interested parties an image of control over the production activity.

5. Improvement of the internal image. It reinforces worker motivation by creating a safer, more orderly and worker-friendly working environment and on the strength of their involvement and participation in prevention-related themes, favouring a preventive culture.

6. Improvement of the production process. Improvement of the processes increases the quality of the marketed product or service. It also avoids loss of resources and cuts down the outlay in equipment replacement.

7. It improves assistance and provision of suppliers, subcontractors, clients and the public at large. An occupational risk prevention management system transmits an image of confidence and responsibility to insurance companies or the general government itself.

TO FIND OUT MORE

1. OECD Guidelines for Multinational Firms.


6. Código de gobierno de la empresa sostenible (IESE, Fundación Entorno, PricewaterhouseCoopers).

7. International Labour Organisation - ILO. Information note on corporate social responsibility and international labour

8. Marco conceptual de la Responsabilidad Social Corporativa (AECA).

9. “10 Principals of the UN Global Compact” - UN.


12. Corporate social responsibility and health and safety at work of the European Agency for Safety and Health at Work.


15. PNE 165010 EX: Ética. Sistemas de gestión de la Responsabilidad Social Corporativa – AENOR.