

AIM answers EC Consultation on its Framework for health and safety at work

AIM welcomes the opportunity to provide feedback on the upcoming revision of the European Commission Framework for Health and Safety at Work. AIM underlines the need to adopt a Health in all Policies approach as an overarching principle. Such an approach goes beyond mere “synergies with other policy areas”, as put forward in the previous Framework. Health in all policies is a sine-qua-non condition to reaching all objectives of the Framework and should thus constitute a rationale for its entirety.

AIM members, as mutual’ societies, are socially responsible employers, stakeholders of the social dialogue at national level and provide services in health and security at work. As already announced in our initial [reaction](#) to the roadmap, AIM believes the framework needs to pay specific attention to the following key trends:

The COVID19 pandemic and better preparedness

For many at-risk professions such as healthcare professionals or carers, occupational health and safety measures need to ensure high levels of health protection. Workers’ health and well-being as well as patients’ and care recipients’ should be in the centre of such a policy. The efficiency of those measures in time of crisis needs to be reviewed and ensured. While the EU has other initiatives on the way, aiming at ensuring better preparedness for future pandemics¹, AIM believes there is room for action through the Framework in:

- Developing guidance for professions at risk on how to ensure proper working conditions and high levels of health protection in times of crisis;
- Promoting the identification and exchange of best practices at European level, that should feed into the recommendations;
- Establishing networks of professionals and using existing networks to step up collaboration on the development of such guidance and contribute to its implementation, in collaboration with trade unions, and ensuring that it is fit for purpose;
- Providing financial and technical support to Member States on the implementation of that guidance, in collaboration with EU-OSHA and with the support of the EU4Health Programme and European Social Fund (ESF).

¹ Communication on Building a European Health Union, Proposal for a Regulation on serious cross-border threats to health, Proposal to extend the mandate of the ECDC and of EMA, the creation of HERA...

The acceleration of innovation and fast uptake of technologies

The COVID-19 pandemic also accelerated a development that was already happening at a slower pace, forcing individuals throughout the globe to telework and rely on ICT tools. To cite but a few examples, in the healthcare sector, telemedicine forced professionals to quickly adjust practices. Employees of mutuals also had to adapt to deliver services online.

Individuals need to have the right tools at hand to keep up with change in order not to feel alienated and continue being active and healthy workers. Opportunities for life-long learning are currently often limited to people who are highly skilled. Given the fast pace of technological development, these should become a reality for all, especially if we are to reduce inequities.

When it comes to skills, the Framework should establish clear links with the Skills Agenda for Europe. Improving skills and allowing life-long learning will be key in bridging the digital divide and making thus sure that technological development does not exacerbate inequities. It would also have a positive impact on individuals' mental health and well-being.

The significant increase in remote work has a clear impact on ergonomic risks. It also puts further pressure on individuals' work-life balance, often jeopardising their right to disconnect. Therefore, the framework should

- Issue recommendations on occupational health and safety during telework: They should help to properly assess and manage occupational health and safety risks in those particular circumstances; encourage the adoption of adapted and steady occupational health strategies and programmes at national level; and work towards ensuring workers' right to disconnect;
- Develop specific awareness raising campaigns on the prevention of risks and promotion of wellbeing in telework;
- Encourage the exchange of best practices between Member States on the issue;
- Focus on mental health as one of the key elements of the above-mentioned recommendations, awareness raising campaigns, and exchanges of best practices.

A life-cycle approach to tackle the impact of demographic change

AIM is convinced that the Framework should adopt a life-cycle approach. Different generations may be facing different challenges. Yet, none of them will be solved if they are tackled in silos. In addition, acting on one generation will have an impact on all. Younger people are facing an unprecedented wave of unemployment and many are turning to non-standard forms of employment (or had already done so). Ensuring high levels of occupational health and safety for them is a key aspect to look at. Older people, on the other hand, will need flexible working conditions, adapted to their specific needs. For them to become more involved in the labour market, ageism and discrimination at the workplace will have to be tackled. For all generations, precarious contracts negatively affect people's mental well-being. They can also lead to poverty, which in turn has a negative impact on individuals' health.

Following a life-cycle approach, the Framework should:

- Identify best practices and provide guidance on the adaptation of working conditions and contracts to the needs of older people;
- Tackle ageism at the workplace by developing EU recommendations, targeting both employers and the general public. Those recommendations should encourage to see older generations as a source of experience and knowledge to be valued. That value should be exploited for the training of less experienced workers.

- Encourage collaboration between Member States and the exchange of best practices in ensuring proper working conditions and social dialogue in all forms of employment (including e.g. platform work).
- Encourage comprehensive and coordinated health and safety policies both at EU and national level to implement the active inclusion of people affected by mental illness and chronic diseases in the labour market. Those policies include measures enabling those with failing health or disabilities to participate and contribute, encouraging employers to offer flexible working practices in order to help workers to remain in employment for longer, and strengthening the knowledge of employers in supporting work ability and return to work after sick leave.

AIM sees a clear added value in the review of the Framework in help achieving some of the objectives set in the EU Cancer Plan and its Green Deal: reducing the exposure of workers to carcinogenic and toxic substances, reducing discrimination against Cancer patients and survivors in the labour market, contributing to cancer prevention through health promoting work places,... AIM also underlines the need to link the work which will be carried out when implementing the framework to other EU initiatives such as the Action Plan on the European Pillar of Social Rights or the debate on access to social protection (to cite but a few) in order to ensure that measures taken complement each other and do not compete for funding. AIM invites the European Commission to include all the necessary synergies and looks forward to contributing to an effective implementation of the Framework. To give only some examples, principles 3 (equal opportunities), 8 (social dialogue and involvement of workers), 9 (work-life balance) and 10 (healthy, safe and well-adapted work environment and data protection) of the Pillar are some the Framework could greatly contribute to. When it comes to the debate on access to social protection for all forms of employment, it should not be dissociated from the discussions on ensuring the health and safety of those workers.