

SGP-UNIMAT: A LABOUR RISK PREVENTION MANAGEMENT SYSTEM

Emilio Gomez Peris, Pere Boix, Jose Terol

UNION DE MUTUAS
(Benefit Society for Labour Accidents and Professional Diseases
of the Social Service nº. 267) Spain

SYNOPSIS OF THE COMMUNICATION:

The key problem we labour risk prevention professionals face is that of having to persuade third parties to alter their ways of acting and to organize themselves.

The task of raising the awareness and promoting changes in the attitudes and behaviour of work leaders is an integral part of the professional activity of the risk prevention worker, and specific competences and skills are required for this task, which are not always present in curriculum programmes.

The experience of most risk prevention professionals leads to the conclusion that in this field, efficiency is proportional to the degree of engagement at all levels of the company, and to the degree of integration of health and safety in business administration.

For this reason, integrated labour risk prevention management systems have become the touchstone for the achievement of good results in prevention, and more importantly, for ensuring that these results are not transient but are upheld in time and continuously improve.

Therefore, persuading companies of the importance of integrating safety and health in their objectives, and advising them in implementing prevention management systems, are the keys to success.

1. REGULATORY AND GENERAL PRINCIPLES

The proposal of the UNION DE MUTUAS (Union of Benefit Societies) in the field of Preventive Management Systems has three fundamental reference points:

a) the principle of integrated prevention laid down in Spanish legislation, which is the lens through which all the other regulatory specifications must be focused;

b) the Directives relative to labour safety and health management systems (ILO-OSH 2001), approved by the IWO in 2001, the highest expression of international consensus regarding the criteria of company risk prevention organization;

c) the EFQM model of quality as European system of references and appropriate frame for the integration of risk prevention in business administration.

Accordingly, the basic principles underlying what we shall hereafter term SGP-UNIMAT (Preventive Management System promoted by the Union of Benefit Societies) is as follows:

- **managerial leadership** and **worker engagement** are two essential conditions for effective prevention without which the system either cannot be implemented (in case management does not take the initiative and lead the changes), or the possibilities of success become highly reduced (if the workers do not feel involved);
- there is no single or ready-made preventive management system model, but procedures must be adapted to the concrete reality of each company, which is why it is always necessary to start with a **needs diagnostics** in matters of prevention;
- **the internal organization and participation processes** are those that create a preventive culture in the company and enable the company's internal agents to address the problems of health and safety, which is why these are considered more important than the performance of activities organized with resources outside the company;
- all the levels of the company must receive **appropriate training for the roles** that they must play in the prevention management system, which is why after these have been assigned, a diagnostics of training needs shall be performed to design specific instruction programmes at all levels;
- prevention management is not a linear system with a beginning and an end, but rather a **cyclical sequence** in which problems are continuously identified and evaluated, and solutions sought, implemented and their suitability verified;
- **continuous improvement** of labour conditions is an efficiency condition that allows advancing in the solution of problems by successive approximations, and the definition of new priorities as objectives are achieved, thus constantly increasing levels of worker health protection;
- the quality and efficiency of a preventive management system are not measured in terms of activities or services but by the favourable evolution of the **results indicators** in matters of health and safety, so that if these are not positive, the question must be posed of the suitability of the procedures developed and of the system itself;

- a coherent system of preventive management must be able to generate the necessary information for the evaluation of its own efficiency, which is why it must incorporate a documentation subsystem to record this information.

These principles can be grouped in four large areas or conditions, which characterize SGP-UNIMAT:

- engagement at all levels of the company
- internal preventive management training
- orientation towards permanent prevention improvement action
- evaluation of the system's preventive efficiency

PRINCIPLES SGP-UNIMAT



Logically, one of the basic conditions governing the SGP-UNIMAT model is strict conformity to regulatory specifications. Moreover, the SGP-UNIMAT model must be able to justify itself before entrepreneurs as the most efficient way of performing one's duties, besides assuring the best results in matters of health and safety.

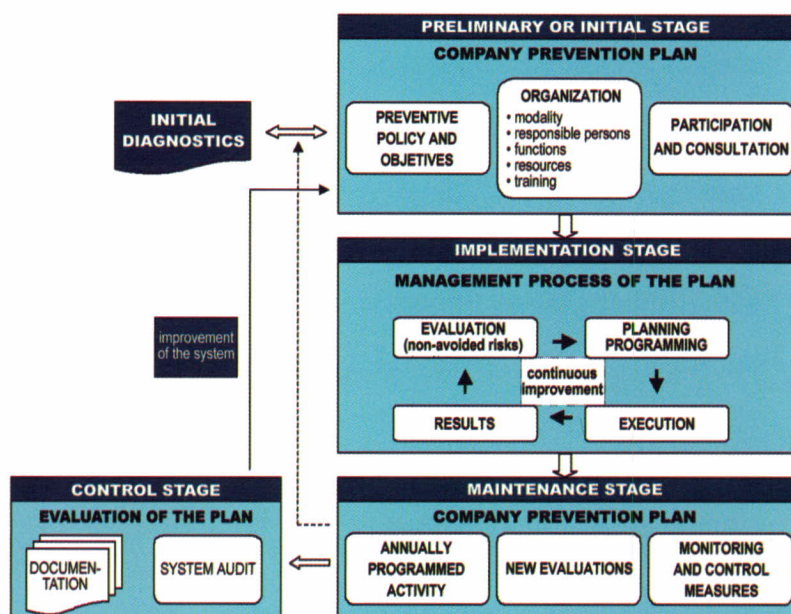
In the first place, to be noted is the preventive approach which can be inferred from the Law of Prevention of Labour Risks (LPRL) and Prevention Services Regulations (RSP), explicitly expressed in following terms:

- **integral prevention:** prevention is advocated of all possible injuries stemming from labour conditions and not just those relating to safety^[1];
- **integrated prevention:** prevention must be integrated in a coherent way in the context of company activities and decisions and at all levels of the company^[2];
- **prevention at origin:** the preventive priority must always be focused on the origin of the risk with a view to achieving safe and healthy labour conditions^[3];
- **continuous prevention:** prevention is oriented towards the effective protection of worker health, so that permanent attention is required to the results of the interventions and to the advance in knowledge for continuous improvement of labour conditions^[4].

With this approach, our regulations propose a model of preventive intervention in the company according to a sequence of actions, which could be outlined as follows:

1. Performance of an examination or initial situation diagnostics as initial regulatory requirement to "know the conditions of each job"^[5], in order to identify risk situations and avoid these as far as possible.
2. Definition and implementation of a **company preventive project** or political-organizational prevention frame by assigning competences and responsibilities, defining action procedures and providing resources (termed "implementation of a risk prevention plan"^[6] in the Prevention Regulations).
3. Initiating **preventive action procedures** either to eliminate identified risks or, in cases when this is not possible, to evaluate and control these^[7] by the ensuing planning of specific actions^[8] and adaptation of the initially envisaged organizational structure^[9].
4. Implementation of a system that enables **controlling and monitoring** the results of preventive intervention^[10] to verify the effective reduction of the exposure to risks and the improvements in worker state of health^[11], or otherwise to adjust and correct the action plans^[12].
5. All these activities need to be the subject of a **permanent action**^[13] for improving the levels of protection by review both of the intervention regarding risks^[14] and the adaptation of the prevention system itself^[15].

PREVENTIVE MANAGEMENT SCHEME ^[16]



2. PREVENTION MANAGEMENT CRITERIA

The SGP-UNIMAT model is established on four basic prevention management criteria to which a fifth criterion should be added when different companies coincide in one same space and/or production process:

1. **ENGAGEMENT OF COMPANY MANAGEMENT IN THE PREVENTION POLICY:** this is what the EFQM model defines as managerial leadership, which must range from top management throughout the entire hierarchy of the company with a view to promoting and driving the necessary changes.
2. **OVERALL APPROACH TO RISK PREVENTION IN THE COMPANY:** focus on improving the set of working conditions with a view to obtaining good results in terms of worker health and safety.
3. **EFFECTIVE WORKER PARTICIPATION IN THE PREVENTIVE PROCESS:** worker integration in all the preventive action stages to assure the acceptability and effective implementation of the prevention plans and their progressive adaptation by continuous improvement processes.
4. **EFFECTIVE PREVENTIVE ACTIVITIES MANAGEMENT:** performance of different activities related to the preventive process in the most coherent possible way with the objectives and capacities of the company, both with regard to specific preventive issues and to management of resources of all types.
5. **COORDINATION OF PREVENTIVE ACTIVITIES:** this criterion is applicable in cases where different companies coincide in one same labour space, and pursues coordination of the different preventive management systems.

These five SGP-UNIMAT criteria can materialize in different ways, depending on the characteristics of each company (sector, size, market position, corporate culture, risks present, exposed population, etc.) and it will be the task of the Union of Benefit Societies officer, acting as an adviser in each case, to establish the most suitable way of adapting these to reality.

However, as a general orientation, a basic application proposal is advanced by defining the optimum level for a series of specific sub-criteria that develop and embody each of what we have termed basic criteria*:

1. Engagement of company management in the preventive policy

- 1.1. Definition of a preventive policy by means of the participation of all levels of the company (*).
- 1.2. Assignment of responsibilities in writing to the entire chain of command.
- 1.3. Effective engagement of the chain of command in prevention objectives.
- 1.4. Role of prominent members of management as interlocutors in matters of prevention (*).
- 1.5. Provision of the appropriate resources for the attainment of prevention objectives.
- 1.6. Systematic evaluation of preventive results (*).
- 1.7. Policies of recognition of efforts and achievements in prevention.
- 1.8. Harmonization of productivity objectives with prevention policies.

* In the context of small companies, the approach can be simplified, by only taking into consideration the sub-criteria marked by an asterisk.

2. Overall approach to risk prevention in the company

- 2.1. Explicit objective of avoiding any injury to health deriving from work.
- 2.2. Attention to risk factors in safety, health, ergonomic and psychosocial aspects (*).
- 2.3. Continuous improvement of labour conditions (*).
- 2.4. Integration of health monitoring as a way of evaluating preventive efficiency.
- 2.5. Implementation of coherent standards or working procedures with prevention objectives (*).

3. Effective participation of the workers in the preventive process

- 3.1. Communication with workers on issues relating to prevention.
- 3.2. Coherent consultation procedures with an explicit will to reach agreements (*).
- 3.3. Recognition of worker capacity for initiative and proposal in matters of prevention.
- 3.4. Regular and ordered working of consultation channels.
- 3.5. Preventive training of the representatives or interlocutors of the workers (*).
- 3.6. Two-way channels of communication (*).

4. Effective management of preventive activities

- 4.1. Model of preventive organization adapted to the preliminary needs diagnostics (*).
- 4.2. Evaluation of risks with the engagement of management and workers (*).
- 4.3. Preventive planning with measurable objectives and efficiency indicator predictions (*).
- 4.4. Effective execution of the preventive action programmes respecting the predictions (*).
- 4.5. Monitoring worker health with defined objectives and feedback of the identification and evaluation of risks (*).
- 4.6. Training programmes based on training diagnostics with systematic evaluation of results (*).
- 4.7. Recording systems that allow access, recovery and use of filed data (*).
- 4.8. Systematic programmes of continuous improvement of the prevention management system itself.

5. Coordination of preventive activities

- 5.1. Integration of requirements in matters of prevention in contractor policy and verification of compliance.
- 5.2. Specific activities of coordination in matters of prevention between the principal company and the contractors and subcontractors (*).
- 5.3. Evaluation of risks and preventive interventions taking into account the risks proper to each company and the common risks.
- 5.4. Exchange of preventive information between the companies and dissemination of this information among the respective workers (*).
- 5.5. Activities and coordination in matters of prevention between the workers or their representatives of the different companies.

This entire set of criteria and sub-criteria has been set out in a questionnaire that can be used in its different versions as a tool for evaluating their degree of application in a company.

3. RESULTS INDICATORS

The efficiency of a Management System for Labour Risk Prevention is not measured in terms of activities but by means of the corresponding results indicators. One cannot speak of quality or of the adaptation of the prevention policy, preventive planning or the implementation of risk control activities if these processes do not increase the probability of the desired results in terms of effective protection of worker health. If this is not the case, the processes and activities must be modified, so that the results match the desired objectives.

The strategic objectives of a preventive management system are by definition health-related objectives. According to the World Health Organization, health-related objectives can refer to: reducing mortality, reducing diseases and accidents, promoting opportunities for a full social, economic and mental life, and assuring equity in health. These principles can be readily translated into desirable health-related objectives in the company: reducing labour accidents and diseases and promoting worker health and well-being. Thus, the main results indicators must refer to health indicators and in particular to the reduction of accidents and diseases.

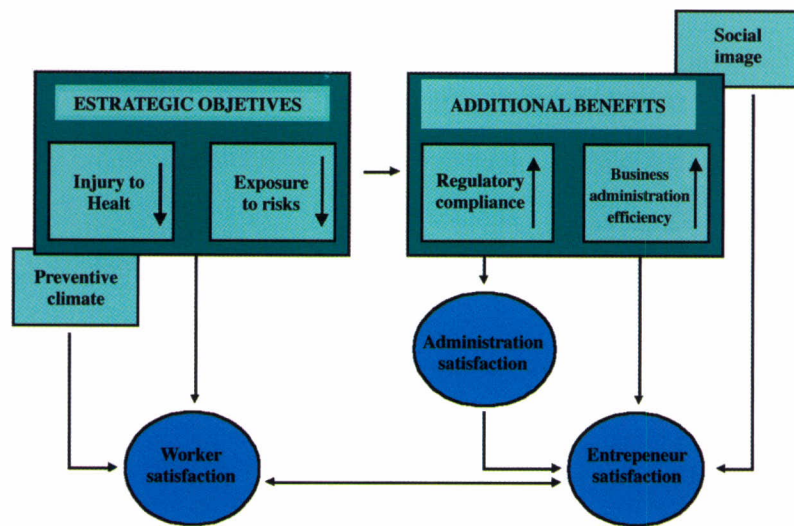
However, by the very nature of labour risks, preventive activity cannot always be expected to find an immediate reflection in these health indicators. The long periods of latency of many labour diseases cause detection of injuries to health to continue, as a result of former exposure to risks that are currently controlled or indeed even eliminated. This is the reason behind the inclusion of exposure indicators in order to enable better evaluating the results of preventive action in the short term.

In addition, the worker satisfaction indicators must also be considered, as workers are the true targets of prevention.

Prevention management has, therefore, certain strategic objectives in the field of health and safety: reduction of injury to health, reduction of the population exposed to risks and increase in worker well-being in the workplace. These are the essential results indicators and it is their evolutionary tendency that will allow evaluating the efficiency of the prevention management system.

Coherent management of the indicated strategic objectives can produce additional benefits for the company, which, although they are not properly speaking preventive results, do need to be considered motivating elements for the entrepreneur. These include, first of all, compliance with regulations as a guarantee for the entrepreneur of absence of conflicts with the administration or penalties due to infraction. It is also necessary to take into account the benefits in terms of business efficiency, both in terms of appropriate investment in preventive resources and in improvement of labour climate, productivity or quality and, even, occasionally in terms of economic profit. The improvement of the company's resulting social image is not to be disregarded either, as a result of company management and results in matters of health and safety.

The evaluation of the results in this field, albeit not a determining element when it comes to assessing preventive efficiency, can help the entrepreneur perceive the advantages of prevention management.



In accordance with this whole approach, the application of the preventive management criteria of the SGP-UNIMAT model should influence the results indicators favourably, and these, in turn, must vary accordingly. That is to say, the efficiency of SGP-UNIMAT must manifest itself in favourable results indicators tendencies in relation to their original situation, prior to the implementation of the system.

We can distinguish two types of indicators:

- **Preventive results indicators**
- **Socioeconomic indicators**

3.1. PREVENTIVE RESULTS INDICATORS

Three categories of preventive results indicators are defined in the SGP-UNIMAT model:

- Exposure prevalence indicators
- Worker health indicators
- Climate perception preventive indicators

These indicators are considered essential and should be evaluable in every case. The system itself must be able to provide the necessary information to calculate these, although this can be the result of a gradual process (please see the annexes to the present section).

These three indicator categories include the following:

1) **Exposure prevalence indicators:**

- a. proportion of workers exposed to risks above the limit value (VLA)
- b. proportion of workers exposed to risks above the action value (50% VLA)
- c. proportion of workers with biological exposure indices (BEI)

- d. proportion of workers exposed to potential accident factors (FPA).^[17]
- e. proportion of workers exposed to risk>75% of osteomuscular injury (Ergo-IBV)^[18]
- f. proportion of workers exposed to risk>25% of osteomuscular injury (Ergo-IBV)
- g. proportion of workers exposed to five or more dimensions of psychosocial risk (Istas-20)^[19]
- h. proportion of workers exposed to some dimension of psychosocial risk (Istas-20)
- i. number and volume of toxic substances used

2) Worker health indicators

- a. frequency of fatal accidents.
- b. frequency of serious accidents.
- c. frequency of accidents with sick leave.
- d. frequency of accidents without sick leave.
- e. frequency of professional diseases.
- f. sick leave duration index.
- g. prevalence of health alterations of probable labour origin.
- h. prevalence of disabilities.
- i. proportion of workers with SF-36<percentile 25%.^[20]
- j. proportion of workers with SF-36<percentile 5%.

3) Indicators of satisfaction or preventive climate perception

- a. mean value of the perceived preventive climate in the company.
- b. proportion of workers with perception of inadequate preventive climate in the company.
- c. mean value of the perceived preventive climate in one's job.
- d. proportion of workers with perception of inadequate preventive climate in their job.

These three indicator categories are interrelated, so that a favourable tendency in the exposure indicators will affect the health indicators positively, and both will in turn positively affect the satisfaction or preventive climate perception indicators.

3.2. SOCIOECONOMIC INDICATORS

These correspond to the following categories:

- Efficiency indicators
- Regulatory compliance indicators
- Social image indicators

These are not properly speaking results indicators of preventive action like the foregoing ones, which is why their objective is not to evaluate the concrete results achieved with the preventive actions undertaken in the company, instead they are much more generic. These indicators must be considered rather like aspects to be taken into account when it comes to making an overall evaluation of how preventive management is being carried out in the company. At the same time, they can all serve as motivation or incentive for the entrepreneur in implementing the management system.

As an orientation, the following socioeconomic evaluation indicators or criteria can be advanced:

1. Efficiency indicators

- a. Employees permanence rates in the company
- b. Qualification and competence levels of personnel
- c. Improvement and innovation in equipment and technology
- d. Worker levels of job satisfaction
- e. Absenteeism rates, days lost
- f. Performance of suppliers in relation to safety and health
- g. Client complaints in relation to the quality and/or safety of the product
- h. Investments in prevention (improvements, technology, protection equipment, training, prevention service, etc.)
- i. Costs of non-prevention (losses, direct and indirect costs, unproductive hours, penalties, etc.)
- j. Relation between costs and results indicators

2. Regulatory compliance indicators

- a. Number of worker or Prevention Delegates complaints.
- b. Number of formal complaints brought before Labour Inspection
- c. Number of Labour Inspection infraction proceedings
- d. Number and types of incidents of non-conformity with regard to applicable regulations

3. Social image indicators

- a. Classification of the organization in internal and external studies
- b. Dissemination to other companies of the company's own experience
- c. Relation with authorities and relevant institutions
- d. Publications
- e. Mass media
- f. Commendations and awards

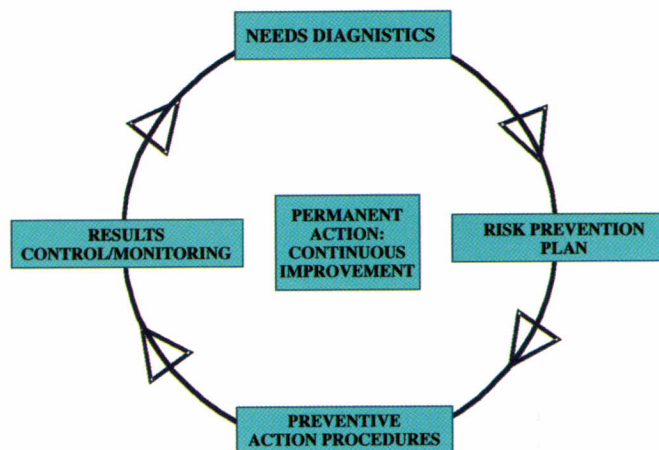
The socioeconomic results indicators are not strictly necessary for the evaluation of the preventive efficiency of the management system, which is why their use will be conditioned by the interest of the entrepreneur and the availability of information for their calculation. However, they should be taken into account as evaluation in every case, and a qualitative reference to these aspects should at least be included in the annual report of actions and results.

4. SGP-UNIMAT MODUS OPERANDI

The prevention of labour risks is a continuous process of problem solving with a view to achieving working conditions compatible with worker health. It is not a linear process with a beginning and an end, as if it were a progressive approach to an objective which per definition is always improvable. Nor is it a mere accumulation of activities either. Rather, in the course of the process, each action undertaken brings us closer to the solution of a given problem, which will in turn allow successively tackling others.

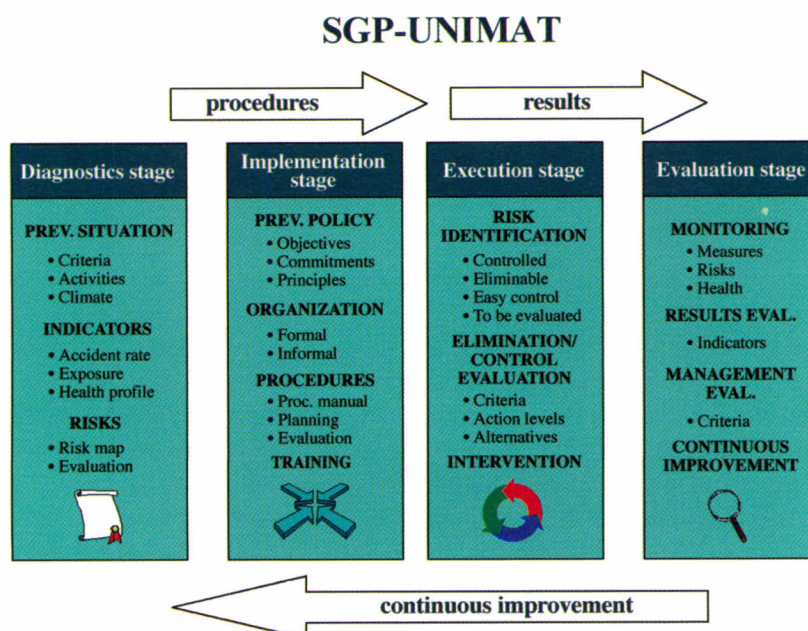
The SGP-UNIMAT model operates on the basis of a cyclical sequence of evaluation, planning, implementation and results control, whose objective is ongoing improvement. This cyclical sequence is simply the way of approaching any problem in risk prevention and operates in the same fashion, whether concrete questions are involved (improvement of job ergonomics) or whether it is attempted to tackle more complex processes, such implementing a preventive management system.

SGP-UNIMAT Preventive Management Cycle



In order to carry out these cyclical dynamics, an appropriate context of organization and training of resources and a general frame of preventive policy objectives are required. This is all based on the concrete needs of each company.

The following scheme sets out the logical steps to be followed in implementing the SGP-UNIMAT model, making the theoretical assumption of a company that initiates its preventive activity.



5. LEADERSHIP AND PARTICIPATION

Successful implementation of the SGP-UNIMAT model has as fundamental conditions the leadership of the entrepreneur, or top management of the company, and concurrent worker participation, which must not only be facilitated, but also driven and fomented by management. Both aspects, leadership and participation, must be assured right from the very start.

Company top executives must make the strategic decision to integrate prevention in their management systems, as a further area of management. Entrepreneurs or company managers are often unaware of the way bad management in matters of prevention can affect the good running of their businesses. The entrepreneur, or top management, is the key to the implementation of an effective preventive management system. From the Prevention Service, it should be attempted to motivate the entrepreneur to engage in coherent prevention management from a strategic point of view and not only from fear of inspection or penalties by the Administration.

Together with managerial leadership, participation is the other essential component of the SGP-UNIMAT system. Besides being a worker right, active worker participation is a necessary condition to enable the entrepreneur to solve the problems that arise in his company in relation to labour conditions and the health of the persons making up the organization. Entrepreneurs must recognize and value workers' capacity to propose solutions, and must learn to listen to them and respond to the initiatives that they can advance in decision-making processes, in the implementation of measures or actions, and in the evaluation of such courses of action.

6. SITUATION DIAGNOSTICS

Before proposing any preventive action, and even before make a concrete SGP-UNIMAT model for a given company, it is necessary to know the reality of the risk in the company and also its expectations concerning prevention.

This is, therefore, a stage of detection of preventive needs and interaction with the entrepreneur in order to strengthen his conviction regarding the suitability of the SGP-UNIMAT model as a tool for solving or addressing those needs.

It is important in this stage to turn company expectations into coherent demands for prevention. This is achieved by comparing the initial requirements of the entrepreneur with the detected needs, and showing how these fit in the different SGP-UNIMAT stages.

Operationally, we propose performing a step-wise needs diagnostics. Thus, one would initially perform a pre-diagnostics, which could serve as a basis for a concrete proposal of a Prevention Service agreement that is sufficiently oriented towards the needs of the company. After this has been agreed, a complete diagnostic can be performed with an initial risk identification that allows focusing the definition of the company's preventive policy and initial organization of the management system. This is what our legislation calls a labour risk prevention plan, i.e., a preventive company project.

Pre-diagnostics generally includes the following features:

- a) initial evaluation of the state of preventive management in the company and of the preventive activities undertaken;
- b) preliminary identification of the risks;
- c) compilation of the data on professional disease and industrial accidents in recent years;
- d) compilation of the applicable prevention regulations in the company.

This information would be used to draw up an initial proposal for an Action Plan, which would be the basis of an agreement with the Prevention Service. After achieving this, it would be possible to begin implementing a series of general preventive management procedures in the company, and at the same time, to carry out the initial risk identification in order to propose their elimination or, if such is the case, the corresponding evaluation for their control.

The process of implementing general management and initial risk identification procedures must serve as a frame for the progressive definition of the preventive project of company, i.e., the formulation of the prevention policy, assignation of functions and responsibilities, configuration of communication and participation channels, as well as the training of every person in terms of his competences and role in the preventive management system.

7. DEFINITION OF THE PREVENTIVE POLICY

The prevention policy is a document that sets out the commitment of management and, hence, of the entire organization with regard to the policy that it wishes to follow in matters of prevention. It shall set the guidelines and strategies to be followed in this matter, as well as the objectives and goals to be achieved, and must be issued by the company's chief executive and be disseminated to all levels.

This is a good moment for company management to begin to demonstrate its leadership. From the very outset, the engagement of board members must not only be obtained in drafting and transmitting a document of preventive policy, but more importantly, in carrying out a process of definition concerning what prevention means for the company, with the involvement in the process of all the members of the organization.

The efficiency in the formulation of a preventive policy can be adversely affected if all the stakeholders are not represented in this policy from the very outset, i.e., the entire organization. The entrepreneur or top management, as well as middle managers and workers should all take part in drafting this prevention policy.

The prevention policy must be signed by the company's chief executive, while the persons that have participated in drafting it will be the ones in charge of its dissemination. Nevertheless, it is advisable for top management to make a formal presentation of this policy to the whole company. The text of the preventive policy shall be visible to all members of the organization, which is why it is also recommendable to put a copy in a visible place in different rooms of the company.

The definition of a prevention policy has at times been considered a process only applicable to large companies, being considered superfluous in those other companies whose size allows the dissemination of company values to be done "viva voce". In the face of this, it is necessary to insist on two basic ideas: first, that the

process of dialogue and participation is of greater importance than the document in establishing the major objectives in matters of prevention and in defining the principal guidelines on how to achieve these; the other is that the document need not be a complicated or extensive text, but must simply set out the commitments acquired as a result of the previous process.

When the document has been drafted, it is advisable to present it formally to the entire company, to underscore its value and importance. A meeting or general assembly, at which the company's chief executive explains its content and encourages achievement of its objectives in matters of health and safety, is a good way of doing this, thus also manifesting the commitment of management itself.

8. PREVENTIVE ORGANIZATION IN THE COMPANY

The preventive organization, i.e., the human and material resources required for the implementation of the system, depends on the results obtained in the previous steps.

At this point, the company must decide which actions it will perform with its own resources and which will be outsourced to a Prevention Service. In the first case, the concrete tasks to be performed will be defined and the people responsible for these tasks will be determined, assuring that the responsibility assigned to the people involved is accompanied by a capacity to decide and sufficient means to perform or have these tasks performed. Should this not be the case, very few will be willing to accept responsibilities, and the tasks will remain unaccomplished.

In legal terms we can distinguish between two types of preventive organization, a formal one and an informal one. The first refers to the figures envisaged by the regulations, while the second includes the underlying structure, which together with the first enables the proper working of the system.

We can refer to **the formal organization** as the modes of organization of resources envisaged by regulations according to company size and level of risk, and the training of the people involved (Chapter III of Royal Decree 39/1997 by which the Regulation of Prevention Services was approved).

The formal organization also includes worker representatives, who usually tend to be great allies when it comes to proposing improvements and solutions, and to disseminating the pertinent instructions among the workers for the implementation of the system.

The Committee for Safety and Health as a "specialized representative organ" is one of the natural targets for consulting and assistance by the Prevention Service (art. 31.2 LPRL). On the other hand, it represents a privileged space for the Prevention Service to be able carry out its functions with maximum efficiency for the series of target groups in the company: entrepreneurs, workers and worker representatives.

The informal organization complements the formal organization and enables the communication and action channels to be sufficiently fluid for the implementation of the SGP-UNIMAT model to be successful. For the medium-large size company, this will be organized in terms of company needs and current structure, particularly taking into account that many companies may have or be implementing other management systems, such as quality or environment management systems. Such a

structure can then be used to organize the necessary resources for the prevention of labour risks.

It is important to take into account the profile of the persons selected to create this informal organization. They need not necessarily be the "chiefs" of areas, sections or departments, in order to be the "ones in charge" or heads of prevention. It will depend on the activity to be performed, so that people need to be sought who "do not hinder" the proper working of the system. These people will need to consent and be willing to take on their functions in matters of prevention. An informal organization can not be imposed. Based on the company's prevention plan, this informal organization will be designed, bringing together the functions of the people who make up this organization. We must also make sure that the people chosen have the proper training to carry out the tasks they are assigned.

The functions and responsibilities of the people that make up the preventive organization in the company, both formal and informal, shall be laid down in writing, indicating how to perform these.

The definition of the policy and preventive structure form the so-called **company labour risk prevention plan**, which sets the strategic framework for all the preventive activity to be conducted. This company strategy or preventive project is not defined in one sole instance, nor is it independent of the preventive needs of the company, but its formulation is part of the diagnostics process, which includes the initial risk identification and evaluation.

9. RISK ELIMINATION AND CONTROL

The knowledge obtained on the working conditions and organizational structure implemented in the company allows tackling a preventive intervention directed towards eliminating those situations that involve risk for health and safety. Different changes in working conditions are thus addressed, some of which will only depend on a decision (e.g. to fill a gap), whereas others must be planned (e.g. substitution of toxic materials). That is to say, strictly following the regulatory specifications, the *initial identification* of risks entails an *initial proposal for elimination*.

The situations in which it has not been possible to eliminate risk are the ones that will need to be *evaluated* in order to propose control measures. It is essential that this evaluation should in some way also involve the company's own resources, not just those specifically dedicated to prevention, but also the hierarchic structure of the different areas or sections, as well as the worker representatives (according to art. 3.2 RSP, the evaluation procedures shall be the subject of mandatory consultation with the workers or their representatives).

Risk evaluation must therefore respond to a specific plan agreed with the company and consulted with the prevention delegates, with explicit objectives and procedures. A suitable place to present and approve this risk evaluation plan is before the Safety and Health Committee, when such a committee is available.

The scope of the evaluation does not need to include all the jobs and all the activities performed in these posts, but just those situations that require this, in which it has not been possible to eliminate risks. However, we must particularly take into account specific activities that are often omitted from evaluations and preventive plans, such as:

- Jobs of a "horizontal" character, i.e., which affect other jobs. For example, cleaning, maintenance or security services.
- Especially hazardous occasional or periodic operations associated with certain jobs, like loading and unloading, cleaning and maintenance, etc.
- Occasionally used areas. That is to say, company areas or facilities in inadequate conditions, where there are no fixed jobs.
- General company facilities, such as heating, electricity, storage, elevation, fire fighting, etc., which must undergo the corresponding regulatory reviews.
- Working equipment and machinery. In those considered "new", i.e., subject to the CE marking, this marking, the Declaration of Conformity and the Instruction Manual shall be verified. In the ones considered "old", i.e., not subject to the CE marking, they shall be reviewed according to the Royal Decree 1215/97 adaptation checklist.
- Emergency measures. These may be laid down in a separate document, if the importance and size of the company warrant this. When such is not the case, they shall be included in the evaluation itself.

Risk evaluation shall be performed in a multidisciplinary fashion, integrating the different factors relating to safety in the workplace, industrial health, ergonomics and psychosociology in a joint evaluation of working conditions.

The health indicators shall be part of the initial risk identification whenever inadequately known risk situations are encountered. There shall also be an informative coordination with the medical service regarding the risks in each job, so that health monitoring will really be appropriate and specific to the particular job and risks that each worker faces.

According to regulations, the initial risk evaluation shall be subject to two types of reviews:

- occasional partial reviews: these will be made when the modification of a working condition could involve a change in the risk situation, or when there is evidence that the initial evaluation was incorrect (from data collected in environment controls, investigation of accidents or health monitoring).
- periodic reviews: these are based on each risk, as agreed with the company and taking into account legal constraints.

A coherent interpretation of these regulatory provisions from a management point of view leads us to consider risk evaluation not as a linear process, with a beginning and an end, but as a dynamic process of successive cycles, which enables analyzing the problems, pursuing changes and verifying whether these changes solve the problems or not.

10. EVALUATION OF THE PREVENTIVE ACTIVITY AND SGP-UNIMAT SYSTEM

The system must be evaluated in order to be able to determine, within the systematics of continuous improvement set out by the SGP-UNIMAT model itself, the corrections required in the action. In this sense, we can distinguish between the "legal evaluation" and the "internal evaluation" of the system.

The former is fundamentally defined by the need for an outside *audit* of companies that have their own Prevention Service, or at least, of the preventive action part that it performs. The internal evaluation focuses on analyzing the results provided by the management system itself.

It is important that as far as possible, the results indicators should be determined beforehand, at least of those results on which data are available, to enable setting measurable objectives of improvement for a given period of time.

It is very important that all the SGP-UNIMAT implementation and development actions in the company should be properly recorded, so that the system can generate the necessary information for self-evaluation.

11. CONCLUSIONS

The implementation of a management system in the company is fundamentally aimed at continuous improvement of the indicators that are established, contributing to efficiency in business administration and the improvement of economic results.

A pilot trial is currently being conducted at thirteen companies, in which a significant improvement is expected in process management, which includes preventive management as a new factor, and which will result in a better social climate.

REFERENCES:

- [1] LPRL art. 4
- [2] RSP art. 1
- [3] LPRL art. 15
- [4] LPRL art. 14
- [5] This activity differs in principle from that of risk evaluation, and need not always end up as such. The primary objective of "knowing the conditions of each job" is actually that of "identifying and avoiding risks" reserving as a second alternative that of "evaluating those that can not be avoided" (art. 2.2 RSP).
- [6] This "plan" shall include "the organizational structure, definition of functions, practices, procedures, processes and resources required to carry out this action" (art. 2.1 RSP), so that this should not be confused with the "planning of preventive action" (art. 2.3 and Sect.2-Chapt.II RSP) for subsequent correction of the risks that could not be eliminated and hence need to be evaluated.
- [7] RSP arts. 2.2, 3.1 and 8
- [8] LPRL art 16.2; RSP arts. 8 and 9
- [9] RSP art. 9.1
- [10] RSP arts. 9.3
- [11] RSP art. 3.1.b
- [12] RSP art. 6.1
- [13] LPRL art. 14.2
- [14] LPRL art. 16.3; RSP art. 6.1
- [15] RSP art. 29.2
- [16] Taken from the "Document on integration for the implementation and development of labour risk prevention in companies", drawn up by the Spanish Head Office for Work Inspection. Madrid, 2002. Mimeo.

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