

An experimental preventive action for SMEs: A Trojan horse for a cross-learning scheme

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Abstract

As regards Occupational Health and Safety (OHS), Small and Medium Sized Enterprises (SMEs) are hard to reach by the health and safety inspection.. Among the remarkable actions which have been implemented in France, information meetings made for every branch of industry can be taken as an example. All these supports have increased the level of awareness of the OHS issue in SMEs but have also reached their limits in terms of effective assistance and generalization. This paper therefore aims at presenting a collective preventive action which involved a research laboratory, a chamber of commerce, OHS advisors as well as the labour inspectorate. This pilot action designed for managers-owners of small businesses under 50 employees allowed volunteers to asses their level of compliance with OHS regulations thanks to a software tool.

At the end of this action a qualitative survey has been carried out to assess the relevance of this experimentation.

Key words:

Small enterprises, occupational risks, compliance, preventive action, risks assessment

Introduction

In France, 55 % of the working population is employed in SMEs. The two thirds of manpower working in SMEs are employed in companies of less than 20 employees and create 66% of the Gross Domestic Product (GPD) . The weight it bears on the French economy account for the fact that OHS could not be durably improved without taking into account the specific problem these organizations represent. Although comparisons between large and small companies are difficult to draw on the international level (Sorensen and Hasle, 2007) a high occupational injury rate in small enterprises – more particularly those which count between 20 and 50 employees – can be observed. (ISAST, 2006)

As regards the OHS issue, managers see the professionals of prevention only through their mission of control so that SMEs seem to be an impregnable fortress (Rigby et al., 2001). There is thus a need to set up adapted devices which take account the characteristics of these kinds of enterprises.

Many prevention programs have been highlighted. They all take into account the characteristics of the SMEs and their environment and are all based on the social, economic, lawful, and professional pressure as well as the one borne by trade-unions (Walters, 2003). These prevention programs which have all been assessed by research are addressed most of the time to the managers with the

attempt to find out how to go beyond the reservations of the managers to get involved in a risk prevention scheme. under a prevention program of the risks.

Among the remarkable experiments let us quote those founded on of the theories of unsought goods (TAIT and Walker, 2000), the psychosocial analyze of involvement (Grosjean, 2003) as well as all the international actions of prevention which rest on intermediaries.(Lamm, 1997; Eakin 2000; Hasle, 2000; Rigby et al., 2001; Walters, 2001; European Agency, 2003; Limborg and al, 2004.)

The questions raised by these prevention programs arose in France when the statutory device of risk assessment unfolded under the pressure of European and national policies. Indeed, the year 2001 represents a turning in the labour law with the introduction of the obligation for the employer to assess the occupational risks. Concomitantly to that, the implementation of OHS national and regional schemes involved a strong mobilization of the actors of prevention in favour of small companies.

The collective action plan which is presented in this paper lies within that particular context and aims to reinforce knowledge on the matter.

The objectives of research are as follows:

- As regards statutory compliance, the aim is to constitute a database of the rates of compliance of enterprises independently of their branch of industry.
- To assess this type of device and its reproducibility.
- To validate the determining factors highlighted by international research thanks to the data collected during the interviews.
- To highlight the new factors of the involvement of the managers to this type of action.

After having clarified the device and methodology used, this paper proposes to have the results of the diagnosis of conformity and the interviews carried out with the managers

Approach and methods

The collective action plan falls under a regional context of assistance to risk in SMEs (Martin and Guarnieri, 2008). The starting assumption of the action is that the causes of this delay are primarily related to a bad knowledge of the regulation by the managers of SMEs.

This collective action plan proposes thus to carry out an audit of conformity in SMEs by using a software tool. To reach the managers effectively, the device uses actors relay which are the Chamber of Commerce and of the Industry of the Alpes-Maritimes (CCI) 06 and one Center of Assistance to the Creation of Companies (CACE). The territory concerned is the department of the Alpes-Maritimes and the action is financed by the labour inspectorate, the Research Center on the Risks and the Crisis of the Ecole des Mines de Paris (CRC) and the participating companies which finance the audit partially.

As regards the actors involved in the action plan :

- The CCI as an actor relay has presented the program to its members assuring them of the data confidentiality and their independence of the mission from the labour inspectorate. This point was a fundamental one within the context of the strenghtening of the control related to the implementation of the new regulation. The CCI constituted here the adviser traditionally used by the contractors. The CACE played the same role with its members.
- OHS advisors but without particular competence as regards SMEs.

As regards the tool which has been used is a software platform of assistance to the risk management which was co-developed by a young company (the Preventeo company) prize winner of a competition of innovating technology and the CRC. Its main customers are the large national

companies in different branches of industry (air transports, chemistry, electronics, aeronautical engineering...), but it also tries to create innovating solutions adapted to SMEs.

It allows:

- to control applicable texts and statutory requirements;
- to identify nonconformities with the regulation;
- to analyze and assess occupational hazards;
- to define actions and priority preventive measures.

This software package which rests on a basis of knowledge of more than 1.000 questions indeed makes it possible to identify the statutory texts applicable to an entity and to check conformity with more than 1.600 regulation requirements.

The selected companies (tables n°1 and 2) were recruited by way of press and mass mailing. Involvement in the program was perfectly free for the participating companies. The size of the companies was one of the criterion of selection The objective of the research was to study companies whose manpower was lower than 50 employees in various branches of industry. Five companies of bigger sizes were selected for the existence of a OHS Committee.

Companies	Activity	SIZE	Staff representative
1	Food flavorings	51	yes
2	Flavors	60	yes
3	Creation of perfume	14	no
4	Perfumery/Produced aromatic	49	Yes
5	Cosmetics	41	no
6	Publicity by the object	50	Yes

7	Material packing and accessory	11	no
8	Protection of the goods and the people	11	no
9	Advertizing agency/posting	40	Yes
10	Humidification/cold	24	no
11	Pharmaceutical	55	yes
12	Agroalimentary	15	no
13	Road signs	60	yes

Table 1. Companies involved in the collective action scheme CCI

Companies	Activity	SIZE	Staff representatives
14	Murals	4	no
15	Demolition and automobile depollution	6	no
16a	body	12	no
17	Plasters and decoration of interior	11	no
18	Frames and construction of houses out of wooden	23	no
19	Management of joint ownerships	6	no
20	Installation of garden and sale	11	no

21	restoration and hotel trade	25	no
22	electronics	3	no
23	Veil	4	no
24	Restoration and depollution after disaster.	24	no
25	Sorting of waste	25	no
26	Pose travelling shutters	3	no

Table 2. Companies involved in the collective action scheme CACE

The companies were audited according to the following outline:

- Phone call to make an appointment for an average of half a day audit.
- Once the audit has been carried out an analysis of the results by the technical adviser.
- A phase of restitution of the results.
- At the end of the restitution and after a work group session (Labour inspectorate, CCI, OHS Advisors , CRC), the representatives of the companies have been surveyed. The survey took the shape of a half-guided interview and concerned three main issues: the general state of the practices of risk prevention, an appraisal of the mission, the contributions of technology. The interviews have been analyzed according to the method of the conceptualizing categories (Paillé, 2004) adapted of Grounded Theorie.(Glaser and Strauss, 1967).

The audits were carried out between September 2005 and January 2007. The interviews have been carried out between February 2007 and May 2007. The interviews which have lasted an average of an hour have been carried out face to face after the appointment had been made. They took place either with the manager or the people in charge of the audit. They were either recorded or notes

have been taken. In 15 of the companies, complementary interviews as well as phases of observation in the workshops have been made possible and have allowed for some conditions of production to become clearer.

Results

The audits for compliance with OHS regulation of the companies were all carried out with the Preventeo software package. In this section of the paper will be presented first the methodology of the tool and then the results of the companies which have been audited.

Results of the audit

The audit follows several stages:

- Stage 1: Formalization of the organization of the company on several levels (establishment/Work unit).
- Stage 2: Identification of the issues and the statutory requirements which applies to the selected entity.
- Stage 3: Unfolding of the questionnaire of the audit to identify the conformities or non conformities with the requirements to be applied. The questions are closed questions.
- Stage 4: Identification of measures in accordance with the regulations.
- Stage 5: Edition of a statutory report of consolidated audit.

The audit is composed of 89 statutory issues distributed according to 14 families of dangers (chemical, biological, travels, environment of the workstation, electric, fire or explosion, handling, mechanics, radiations, human factor, work in height, situations with visual constraints, organization).

The first work of the auditor and the person in charge of the establishment is thus to identify the statutory issues to be applied to the company according to its size, its activity and the material which is being used.

For each issue which has been identified, a questionnaire is proposed. This latter one rests on the specific texts in relation to the selected issue.

Each statutory requirement which is not respected or for which one cannot bring the proof of its respect involves a nonconformity.

The percentage of statutory compliance of the company is thus the number of statutory conformities divided by the number of requirements to be applied to the company.

Each nonconformity is subjected to a recommendation chosen according to 11 means of prevention which are: piloting, analysis, design and the fitting out of the work place, checking and periodic control, documentary control, the means of intervention and help, medical supervision of the personnel, the concept of collective protection and the individual protections.

The distribution of the statutory compliance as far as occupational health and safety is concerned of the action which have been carried out with the chamber of commerce and industry reveals percentages of statutory compliance ranging between 35% and 63% according to the companies.

The results of the second action show percentages ranging between 49% and 67%. The average of the nonconformities for all the companies is of 43% for a median percentage of 49%.

The companies which obtained the highest percentage of compliance are the companies which have a health and safety committee and/or which have a safety expert in-house.

The results of the enterprises' compliance according to the families of dangers present important variations (table3).

Families of dangers	% of conformity
Set fire to or explosion	21%
Human factor	35%
Chemical	18%
Mechanics	35%
Management	43%
Environments of work	0%
Biological	45%
Handling	30%
Work in height	27%
Electric	40%
Displacements	50%
Situations with visual constraints	0%
Radiations	0%
Environment of the work station	0%

Table3. Results by family of dangers for all the enterprises which have been audited.

By sharpening the analysis of every family of danger, it can be noted that the points for which the percentage of compliance is the highest are those for which there is a topicality in terms of prevention.

Indeed, the highest rates are reached for the mechanical field, for the human factor management and the electric fields as well as for travels. However, within these families strong disparities can be observed.

Concerning the dangers of the mechanical family, for the use of elevators and boilers, the rates of compliance are of 50% for the all the companies, they are only of 33% for the use of work equipment. For the handling, statutory compliance related to the lifting gear are filled to 35% but to 0% for manual loads handling.

As regards chemical risks, the statutory requirements which concern asbestos are filled to 44% but they are only of 8% concerning substances or dangerous preparation (except agents Carcinogenic Mutagen and Reprotoxic agents (CMR)) and of 9% concerning the exposure to the CMR agents.

As regards the human factor, on eight statutory issues , four have rates of conformity of 0%. They concern night shifts, alcohol at work, the presence of smokers on the work place and the formation when an outside firm utilizes its personnel in a user company. The obligations concerning the intervention of the personnel in outside firms and the recruiting of the personnel are between 33% and 50% and have striking disparities. Indeed, whereas the percentage of compliance concerning the personnel engaged in the form of permanent contract is of 50%, it is only of 38% concerning temporary work and 33% concerning the presence of personnel engaged under fixed-term contract .

Eventually, the family of dangers related to the safety management reveals that among all the companies which have been audited only seven had carried out/filled set up their OHS risk assessment form. It concerns the largest companies of the sample.

The results by means of prevention have shown a tendency to privilege the individual protective equipment to the detriment of the collective protection. Indeed, whereas the regulations concerning the provision of individual protective equipment is respected to 63%, compliance with the regulations concerning workstations is nonexistent, and compliance concerning the collective protection is usually only filled to 25%.

All these data confirm what is observed in companies of this size. Concerning the individual protective equipment, there is a tendency to consider that the employees are at the core of the problem and that they must ensure their safety.

In terms of training and information of the personnel. The companies which have an OHS committee show they are more compliant, which confirms the results of the SUMER survey

(DARES, 2008), namely that training and information provided to the employees are related to the existence of a workers' representation.

There is thus in the whole sample great disparities between the companies with a tendency to higher compliance for the companies of more than 50 people and which have a staff representation.

If statutory compliance meets a certain number of limits to assess the level of prevention of a company, it is nevertheless an interesting indicator since it both allows to take stock of the situation and to reveal the points on which there is a certain homogeneity in terms of compliance or nonconformity. It should be noted that it is difficult to reveal differences according to the branches of industry.

Results of the interviews

As a whole, the mission fulfilled its objective. Beyond a simple mission of information and meeting on exchanges of practices, it has allowed the companies to become aware of the statutory frame of reference and to take some time to ponder over these issues. Most of them have kept the control over which priorities they should deal with first, although it has been agreed that a certain number of questions could be treated at the same time.

The managers' position however splits into two different opinions:

- The first considers that the regulations provide the main themes towards improvement.. There is in that case a spreading of the results and a work in collaboration with the organizations of prevention.
- The second considers on the contrary that the spreading of the results represents a threat for the company (family business and of smaller size with an absence of staff representation). In that case the information are confined to the managerial level.

- Interview of the managers/owners : Validation of the international invariants

The objectives of the semi-directed interviews carried out at the close of the restitution of the diagnoses were to validate in France a certain number of international invariants highlighted by the literature and to reveal some categories which would explain and highlight the determinants of the managers' involvement into this type of action.

The analysis of the interviews was done according to the method of the conceptualizing categories, the categories which corresponded to those highlighted by the various studies were retained and are presented below. Five main categories were considered: the attitude of the manager, his perception of the role of the institutionals of prevention, his/her membership to a professional network, the evolution of occupational risk management according to the life cycle and the relationships between the OHS advisors and the managers.

- The attitude of the manager

What the results of the survey carried out with the enterprises involved in the collective action programme have revealed is that no managers have shown a lack of interest in OHS matters. The free participation in the programme may have skewed the results insofar as it may be considered that all the enterprises involved in the programme were concerned with the issue.

During the interviews, when asked questions about the level of information at their disposal as regards OHS regulations, 62% of the managers answered they consider being quite well informed. This statement needs nonetheless to be qualified as some of the participants do indeed consider being rather well informed whereas some others consider to have an acceptable level of information. A more detailed description of the means of information at their disposal allows to sharpen their answers and to distinguish between:

- The managers well informed about the means of information at their disposal, going regularly on institutional sites and quoting them spontaneously. It usually concerns the companies employing staff representatives.
- The managers who are part of a trade-union network and who consider themselves rather well informed. As the managers of the first group they are aware of the extent of the regulations.
- The third and last group includes managers whose fragmented information is lavished by the advisers of the company, accountants, lawyers, safety advisers. For these latter ones, many gaps as well as contradictions could have been observed during the interviews showing their lack of knowledge of the matter.

The most widespread attitude is that described by Eakin (1992). Hazards are left to the employees' judgement – they are either considered as professionals who know their trade or as immature employees one cannot watch all the time.

“ The guys have been mounting frames for 20 years, it's when I tell them to tie themselves up or tell them to do things they are not used to that I put their life at risk. Same for the shoes, if I make them wear safety shoes, they just can't, they are used to their climbing boots, they are more flexible”.
Carpentry manager, 20 employees.

The profile of the manager distinguishing himself/herself by his/her non conformity is the incompetent manager as described by Lamm (2001). He/she is described as having few competences in human resources management but his/her nonconformity is due more to the ignorance of the rules than to his/her deliberate failure to comply with them.

- The level of proximity with the institutionals of prevention

A second determining level of prevention is the degree of proximity with the institutionals of prevention. During the interviews, the relations with the institutionals of prevention were approached on various occasions. For most of the managers, the relationships with the social insurance inspectorate and the labour inspectorate were badly thought of.

“I do not willingly appeal to the labour inspectorate. They are people who wrongly or rightly are from the point of view of the employers badly thought of .” Production manager, perfume industry.

These organizations are always associated with a mission of control and sanction.

“When one works with the occupational medicine and the factory inspectorate, there are always the two aspects of help and control” Production manager, perfume industry.

The managers often feel as if a particular hazard was emphasized at a particular period of time and as if all the rest was disregarded and overlooked. “If I had to define the social insurance inspectorate I would say that all they do is to look for problems (...). I think that from time to time they are called to order. They have very specific ideas about how things must be done.” Production manager, cosmetic.

A lack of comprehensive view and technical training of the professional cultures on behalf of organizations of the prevention are frequently underlined.

There has nonetheless been an evolution for the companies in which there is a Health and Safety Committee. In this case, even if limits in terms of competences on behalf of these organizations are highlighted, the relations are more open.

Throughout the interviews there still is a difficulty to establish a contact between small companies typical of a family firm and the organizations of prevention. This result confirms the Swedish studies presented by Walters (2001), in which 47% of the small companies have never been contacted the labour inspectorate whereas they only represent 18% in the large companies.

- The importance of the employer's social network

As regards the integration of the managers in the trade-union networks, the interviews have shown that those who work with a professional organization have taken part to more training session on this issue. However the level of compliance to the regulations is not higher than in other companies.

- Prevention and life cycle of the company

The state of prevention follows the life cycle of the company. It is the conclusion of the investigation of Favaro (1999) who considers that the development of a small company involves a certain number of internal and external changes at the origin of a modification by the managers of the perception of OHS problems. Although it is not easy to set with accuracy the life cycle of a company, 10 managers out of 26 were able to define the stage in the evolution of their company whether it be in technological terms, in terms of turnover or manpower. On several occasions the question of OHS was related to the environment and a global process of certification and setting to the standards.

” The action has come at the right moment for lots of reasons. I did not have time to deal with that before. The department had been structured and we have employees doing what I was doing before. Three years ago, we were 4, today we are 22. When you set up your business, the main point is to live, to exist, not to disappear. You have to develop a product and convince the customers. I am not telling this is not the case today but we can say that we’ve been through that and what we have to do now is to perpetuate our activity and safety is a way to do that. We can’t miss that out but it’s not you start with when you set up your business” humidication/cold enterprise manager

The action thus has both provided information on the regulation which applies to companies but corresponds also to a will to implement tools and develop a methodology.

- OHS advisors-managers relationships

The relationships between the advisors and the managers are described in the north-European literature (Hasle, 2000; Limborg, 2004). This research work underlines the difficulties of making

cohabit the two cultures and the necessary training of the advisors to OHS problems in SMEs. The advisors have indeed a strong tendency to assess the level of compliance of the small companies by comparison to the large ones. All the advisors involved in the action have met for the groundwork sessions as well as for the analysis of the results. One of the main interest of the advisors concerning their involvement in the research project was that of a better knowledge of the running and the attitude of small firms facing OHS issues.

Two outstanding facts were raised by the advisors:

- The first is that of the difficulty of making an appointment with the managers or the representative delegated to the audit. The action was planned on a whole year. It was delayed for nine months with great intervals between the audits and their restitution. That time lapse will be greatly referred to by the managers as it will be seen in the next section.
- The second is concerned with the pedagogical feature of the audit; especially during the restitution when the manager seeks to validate his/her level of compliance. The audit becomes a pretext for an exchange of information which seem basic for the advisor.

The survey has thus allowed to find in France most of the the invariants highlighted by international research. There indeed is a size effect which allows to distinguish similar approaches in the companies with less than 50 employees whatever the branch of industry. Independently of the risks met and the professional cultures, the level of prevention depends largely on the attitude of the manager.

- The deciding factors to the involvement to a collective action

The analysis of the interviews has furthermore allowed to reveal a number of categories which have provided a better understanding of the deciding factors leading to an involvement of the companies to this kind of collective action. This part presents and connects them. The managers' motivations

related to the way they conceive time and an underlying concern accounting for the involvement to the action will be the subject of the first two paragraphs.

The trust and the existence of a tool as a support of the audit are the requirements of the involvement in this scheme will be treated in the following paragraphs

The appropriation of the data of the audit and the operationalization of prevention are the objectives to be reached for the managers and will be described in the last paragraphs.

- The efficiency of the action

A first observation relates to the time devoted to safety. Time must be productive. Through the interviews it appears that the decision to get involved within the program is strongly related on the duration of intervention which was proposed and to the supervision of the program by an expert. The time that the managers of SMEs can devote to an action of this type is short compared to what may think the advisors.

“It was very long, we have spent maybe four hours on the software part” Responsible perfumery production.

The actions under consideration in other countries spreading over several meetings would not have been easily conceivable in the SMEs of the sample.

“It was very long, the fact that it was supervised was quite interesting because the person who was there gave us the impulse, but it was long anyway, I think it lasted the whole afternoon”. Production manager, cosmetic.

Besides, the financial check is more related to the effectiveness of time which has been spent than to the cost of the action in itself.

“The cost of all these trading standards and these regulations is incredible, I mean, in terms of productivity. It takes time, it’s very expensive and we’ve often got the feeling it’s not worthwhile”

Manager, Agroalimentary

Time is thus an important component in the decision whether the manager will get involved in the collective action. It must be in coherence with the production constraints of the company. The smaller the company is, the more the versatility of the manager must be and more it weights on the time spent for safety matters. The financial aspect becomes then crucial (Walker and TAIT, 2004). It is not really the cost of the action which is determining but the cost of the time spent related to the competences of the advisor.

“I think we’ve all benefited from that experience, in terms of tools, quickness of his answers to our questions and the questions he asked us. We have spent two whole days with him but in terms of results it was very good” Human resources manager, pharmaceutical sector.

- The manager’s concern

The interviews reveal a concern about the explicit or underlying regulations applied to the enterprises. The involvement to the programme itself reveals that endemic doubt. When the action was proposed, one of the unknown factors was the degree of participation of the companies. In the two actions, the reaction times were very short and the number of voluntary companies has allowed to select a sample of companies corresponding to the needs for the survey.

Concern is initially in relation to an absence of knowledge of the regulation as a whole.

“There are new regulations coming up all the time. I wonder whether anyone have heard of them all. What is surprising with the audits is that every year or every two years we call upon somebody to have an outsider’s viewpoint on the level of safety and every time something new shows up so the job’s never completed.” Production manager of a company of road signs.

In a second phase, the managers who have been interviewed have expressed a concern and helplessness facing the regulations and some difficulties of establishing a regulation alert system.

“I think that we endure things more than we are informed. There’s a lack of information. As far as we’re concerned, did we knock at the good door? As a general rule I think there’s an excess in

standardization. But when we look at it there's always something positive about it – to make the company improve and go forward but it's always presented in such a way that we rather feel overwhelmed with all these regulations instead of trying to find positive solutions.” Manager electronic company.

That doubt and that feeling of helplessness accounts for the recourse to an expert. The expression which is most often uttered is 'to win each other's trust.'

“The advisor's is impartial in his analysis and helps on what is necessary to do and what is made elsewhere” Technical manager, packing industry.

The managers need to be guided The fact of being able to rely on a tool as well as a methodology gives credibility to the procedure and meets the needs for method. The support of the software tool allows to minimize the doubt SMEs have to overcome. The statutory approach requires an expertise to highlight the texts which apply to the company. It allows an comprehensive approach guided by the consultant. “We could have answered the software questions without the assistance of a consultant, the problem is rather to ask the good questions” Technical manager, road signs company.

The software tool becomes an artefact which provides a context in which knowledge is shared. The software tool becomes a central support for the contribution of knowledge but becomes also a training tool to statutory compliance. The direction of a text can be explained throughout the questionnaire. The audit is not confined to the binary aspect 'conforms and does not conforms' but takes an important pedagogical dimension for the implementation of the preventive device in the company. Indeed, the manager must have interiorized the finality of the rule to conform to. The preventive action becomes then a formative one.

The explanatory role of the adviser is then reassuring and answers the concern of the manager.

“It gave us the impulse and certain explanations of why and how. We need explanations but also to know where we stand compared to the other companies. It was important he was there not to be panic-stricken” Manager, bodyshop

Beyond general statutory knowledge, the adviser brings an external and global glance on the company.

“You cannot be a judge and part of your company. Insofar as he (the advisor) has made an analysis in which there are things you know but he sees them from an external point of view. They have the value that you grant them, but nevertheless even if it is not your vision, it has a value because it comes from someone else”. Manager of a company of electronic.

Here are expressed both a need to look at things in a new light as well as a comprehensive understanding of the enterprises. When the synthesis appears severe for a good number of companies the adviser helps the company to place itself in relation to the requirements and correct nonconformities.

- The appropriation of the results by the companies

The spreading of the results within the company after the advisor's restitution presents some contrasts according to the companies.

Although this is not systematic, the results of the audit have known a wider spreading within the companies which have a health and safety committee. Compliance to the standards is in this case seen as a dynamic process.

“The restitution was important because that allowed us to identify the most important working tracks, what were the gaps we had in terms of safety compared to the employment regulations and try to find a solution to bridge them. (...) the results are what they are but we didn't know how to express them. We are not ashamed because we're working on it, we improve and get better” Human resources manager, pharmacy.

The companies without staff representatives have a more confidential vision of the results which goes through a phase of reappropriation of the audit and an organization of the priorities. The audit remains confined on the level of the manager and of a his/her close assistants.

As a whole the companies reacted quickly to the results of the audit.

“Well, our priority now is to implement all the recommendations. I’ve already made about ten corrective notes since the advisor’s restitution, simple little things we have set up. We are now well aware of these recommendations and the thing is to implement them all. Well, sometimes there are things which are...er, where the annotation is a little bit restrictive because points of minor interest are dealt with the same way as are important matters...we have to sort through them.” Manager agroalimentary sector.

- Operationalization of prevention

Another issue which is raised is the one of the operationalization of prevention, i.e. how to go from statutory compliance to the implementation of preventive measures.

The bigger the size of the enterprise is, the more the manager admits that compliance with the regulation is a means to improve health and safety. This approach is different for the small companies which highlight the difficulty in applying a regulation which does not take into account their specificities in terms of size and financial resources.

Whatever the attitude, the question raised is that of the perpetuation of prevention as well as the human resources assigned to it.

Concerning the perpetuation of prevention it is related on the one hand to the frequency the company will be diagnosed and on the other hand to the passage from statutory compliance to practical experience..

As for the competences required for the operationalization of prevention program which have been defined, the answers the managers have brought along are certainly diverse but all highlight the

importance of the share of competences within the enterprise between the human resources, the production department and maintenance.

It is thus not rare to see the manager and the person in charge of maintenance or the site foreman and the administrative assistant to collaborate at the time of the realization of the audit.

This collaboration during the audit can precede a possible system of actors for the operationalization of prevention. It however differs according to the companies particularly concerning practical experience.

Some of the interviews reveal that the managers have a very hierarchical vision of the person who must be associated with the prevention of the risks. The department managers are sometimes mentioned although this level of responsibility does not suit the function (Berthelette and Planchet, 1994).

The great majority of the companies presents this profile. OHS matters are delegated most of the time to the assistant the manager has entrusted with the job because of his/her technical competences. Only the family companies are marked by a more important presence of the manager on the matter.

The qualitative analysis of these interviews was thus at the origin of the emergence of new categories which explain the determining factors which made the enterprises get involved in a collective preventive action scheme.

The first motivation is a concern, a fear of a weakening of the company at a stage which is generally a crisis period of change or metamorphosis of the company according to the analysis that is given (Couteret, 1996; Torres, 1999).

The effectiveness of the action is a crucial point. It is measured through the time spent in a logic of optimization of the cost (time) which excludes the formats which exceed half a day. The existence of an actor relay is all the more fundamental as this actor is not dependant on a branch of industry.

The chambers of commerce are for this reason neutral actors from the managers' point of view of the leaders. The involvement of an actor relay is however insufficient. The actor relay guarantees the competences of the expert in the implementation of a methodology which allows the managers benefit from an external point of view on the company.

This external point of view is a triggering event which prompts a training to an overall statutory compliance and adaptable to the company.

The knowledge generated by the audit must be appropriable by the leader. This latter one is free to decide of the spreading or not of the results, to set up a plan for action or improve compliance according to a prioritisation of the actions fixed during the board of directors and with the help of their assistant.

Finally, the results of the action must be made use of. This last point meet the perennality of the preventive actions which according to the managers must lead to the operationalisation of the prevention.

Conclusion

The implementation of a device of this type rests on the assumption that the collective action was the most adapted action to reach effectively SMEs but also on the assumption that the statutory pressure is a fundamental element of the performance of the companies in OHS matters. Necessary although not sufficient condition to improve the level of prevention. It is a non sufficient condition since the fear of the sanction is not significant enough to make the manager aware of the issue and prompt him/her to undertake preventive actions. This is the reason why the device should have therefore relied on a relationship of trust between the OHS advisors and the managers. The

software tool ensured thus the impartiality of the advisor who concentrated his/her efforts on a pedagogical approach adapted to the audited manager.

The assessment of the study shows an interest for the various partners of the collective action. For the companies the opportunity of having a global approach of their OHS regulation compliance.. For the institutional of prevention a better knowledge of the state of compliance of the small companies. For the OHS advisors a possibility of a better knowledge and understanding of the culture of these companies thanks to the relationship they have established with the managers.

On the whole, what is revealed is that this pilot project allowed to reach the companies and to provide them tools and methods.

The reproducibility of the action is nevertheless hampered by a great number of limits. .

The first one is the financing. The participation requested from the companies was low considering the real cost of the action. According to the OHS advisors, had the market price be applied to the cost of the action scheme, it would have represented a hindrance to the involvement of the enterprises to the plan.

The program rested on the existence of an actor relay, which supposes that this latter one is ready to carry out regularly programmes of this type. However the OHS issue raises the problem of the responsibility of the actor relay in the event of an accident. Providing this type of diagnosis in the long term may represent a risk factor for the organization which carries out the action.

Eventually is raised the question of the passage to the statutory compliance in itself. Is an action based on an audit about OHS regulation compliance sufficient to implement long lasting risk preventive action within the company ?

The analysis of the interviews have revealed new relations between a real concern of the managers and the decision to get involved into the preventive action scheme. Far from deliberately not acting

in compliance with the regulations and taking risks to answer a logic of profit, the managers seem rather anxious and resourceless vis-à-vis the offer of prevention whether institutional or private.

Finally as it has been highlighted in the international surveys, the perenniality of the preventive action is an essential point. Preventive action cannot be sufficient in itself and must take form of a prevention plan allowing the company on the matter to evolve. The main issue is therefore the operationalization of prevention taking into account the characteristics of SMEs.

Word count: 6836

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