

Safe4All Policy Recommendations

How to improve Safety and Health at work for persons with disabilities through training regulation



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Table of Contents

Introduction	2
Problems to tackle	4
Opportunities.....	5
Policy Recommendations.....	6
Mandate Inclusive OSH Trainings to all actors involved.....	6
Revise existing OSH regulations and standards at the workplace.....	7
Establish Data collection and reporting requirements	8
Raise Awareness and Foster Knowledge Sharing amongst diverse partners	9
Conclusions	10

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Introduction

In the workplace, workers are exposed to different risks that may affect their health and safety either directly or indirectly. However, according to EU (European Union) law and policy, workers have a right to be protected and employers have an obligation to minimise risks. Principle 10 of the [European Pillar of Social Rights](#) stresses that *'workers have the right to a high level of protection of their health and safety at work'*. Despite this, in practice, we see that Occupational safety and health (OSH) measures and guidelines are not always tailored to the specific needs of persons with disabilities. Therefore, this paper provides a set of recommendations aimed at improving Safety & Health of people with disabilities in the workplace, by creating more inclusive legal frameworks and specific training requirements. The recommendations below are addressed to policy makers at national and EU levels, but hold relevance also for other key stakeholders, namely EU-level and national cross-sectoral and sectoral social partners such as care, employment and support services.

Currently, about half of the 42.8 million people with disabilities of working age in the EU are [employed](#). Although many persons with disabilities still work in conditions of sheltered employment rather than in the open labour market, delving into this reality is beyond the scope of our research. Suffice to say that the OSH training which will be proposed in this paper can easily be carried out in those settings too, to build invaluable transferable skills that facilitate the transition to the open labour market. The policy recommendations presented here are grounded in research, expert review, and first-hand experiences gathered throughout the Erasmus+ Safe4All project. This project aims to foster safer workplaces for *all*, not just some; to promote social inclusion, independent living, decent quality of life and equal employment opportunities for persons with disabilities (PwDs) in line with the UN Convention on the Rights of Persons with Disabilities (UNCPRD) and EU values.

In the European Union, workers with disabilities are protected by both anti-discrimination legislation and occupational health-and-safety legislation. The 1989 EU [Directive 89/391/EEC](#) on OSH also known as the "Framework Directive" is the basis for common requirements and minimum standards across the EU on OSH, while Member States retain the discretion to establish more stringent measures. Aligned with this, the EU [strategic framework on health and safety at work 2021-2027](#) underscores the necessity of Member States cooperation to address the changing landscape of the modern workforce, enhancing prevention of workplace accidents, and increasing preparedness for potential health crises. The EU Commission has further recognised the importance of this area in its Flagship Initiative, the [Disability Employment Package](#), by stressing its role in implementing pre-existing legislation in "Preventing disabilities associated with chronic diseases". These legal and policy principles form the backdrop against which the pressing issues of workplace health and safety for persons with disabilities unfold.



Problems to tackle

In 2022, the Safe4All project partners conducted a study titled *“Research Report on regulations and good practices related to the inclusive vocational trainings for workers with disabilities”* on the state of play of health and safety legislation and practices in the EU. The main finding from this report is that, although there are different national frameworks and EU regulations that set forth guidelines for safety and health in the workplace, there is a stark absence of OSH trainings that encompass the specific needs of persons with disabilities in these environments. The desk research conducted by the Safe4All project partners within the scope of this work package corroborates these conclusions, showing that existing legislation relies on generic and standardised policies. Within these, persons with intellectual disabilities and intersectionality issues are often neglected, and the focus primarily remains on prevention rather than active reinforcement of employee well-being.

A recent [Report](#) by the EU Occupational Safety and Health Agency (EU OSHA) reveals that the level of implementation and enforcement of compliance with OSH legislation has stagnated. The capacities of the OSH infrastructure at national levels show a mixed picture in EU Member States. Policies are hard to communicate effectively and it remains challenging to motivate and incentivise employers to invest resources (time, money, staff etc.) to strengthen internal OSH management systems. Providing reasonable accommodations for workers with disabilities - as stipulated in Article 27 of the UN CRPD - is especially seen as a burden. Nonetheless, research and cost/benefit analyses from the International Labour Organisation repeatedly prove that better OSH management brings both direct and indirect [benefits](#) to employers. The reasons for the persistence of such outdated and unfounded claims amongst employers (in Europe and worldwide) include insufficient training and awareness regarding different forms of disability, inadequate consideration of PwDs in risk assessments and overlooking intersectionality issues.

Even in the aforementioned EU OSHA ‘state of the art’ picture, there is no direct consideration of experiences of workers with disabilities with safety and health at work. This reflects a one-size-fits-all approach at the European level that is inapplicable to effectively represent employees with disabilities. Instead, when drafting OSH policies and training, it is essential to bear in mind that persons with disabilities are not a homogeneous group, with very diverse health and learning needs.

Finally, [research](#) has shown that work-related psychosocial risks (PSR) are a major contributor to the burden of disease in Europe. Hence, employers should be educated on PSR to show that it is also to their benefit that preventive measures are undertaken in this area. In this regard, the aforementioned ‘Framework Directive’, highlights the importance of having OSH service providers and labour inspectors properly trained in psychosocial risk management practices. Clearly, mobilising a range of actors via a holistic approach is required to aid employers in fulfilling their obligations vis-à-vis workers with disabilities.



Opportunities

Amidst these challenges, opportunities for transformation and progress emerge. A more inclusive approach to health and safety at work not only strengthens the rights of persons with disabilities but also yields substantial opportunities. By bridging the disability employment gap, which currently stands at [around 21%](#) across EU Member States, fostering inclusive workplaces can combat negative perceptions around cognitive impairments, reduce workplace incidents, promote social inclusion, ensure equal opportunities, enhance economic growth, and contribute to sustainability. Diverse workforces lead to better problem-solving and innovation, enhancing competitiveness of an entity/business. A [World Economic Forum \(WEF\) study](#) showed that more inclusive companies achieved 28% higher revenue, double the net income, and an average of 30% higher economic profit margins over the four-year period analysed. Furthermore, prioritising health and safety not only boosts employee well-being and morale, but also aids companies in understanding diverse customer needs, expanding market reach, and reducing reliance on social welfare systems.

In the face of [evolving labour market trends](#) such as remote work, an ageing workforce, digitalization, and increasing awareness around psychosocial and mental health needs, inclusive policies become not just a necessity but a strategic imperative. The urgent need to address labour shortages, a problem facing all European countries as [highlighted by the European Labour Authority in May 2023](#), reinforces the vital role of policy actions as we cannot afford to exclude segments of society from entering the open labour market, or cause their early exit from the labour market. Placing an emphasis on upskilling and reskilling trainings to bridge existing skills gaps as suggested by the World Economic Forum [2023 Report](#) will contribute to ensuring the well-being, empowerment and meaningful inclusion of persons with disabilities in the evolving labour market. Reduction in accidents and ill health at work is a global priority as per the [UN 2030 Sustainable Development Goals](#) 3 (Good Health and well-being) and 8 (Decent work and economic growth). Europe, in its pursuit of corporate social responsibility through its environmental, social, and governance (ESG) strategic framework and sustainability [initiatives](#), stands poised to champion the empowerment of persons with disabilities through meaningful, safe, and healthy work. It has the power to set OSH standards and pass legislation which Member States should translate accordingly into national policies, as well as the power to influence crucial factors that lead to their assimilation in society, namely over funding and raising awareness.

The Safe4All guiding approach has three key characteristics: it is integrated, intersectoral and individual-centred. This is underpinned by a rights-based model to frame disability as per the UN CRPD Convention, and the premise that each person has their own competences, abilities and potential. Each type of work has its own challenges, so these difficulties have to be considered in the type of assignments, roles and responsibilities given to each employee. It is essential to recognise that people with disabilities can also adapt to their environment when given the appropriate support structures, such as tailor-made OSH trainings that respect EU Regulations. PwDs are not regarded as passive beneficiaries of the following recommendations, but rather as a significant stakeholder group to account for and consider.



Policy Recommendations

Building on the findings of Safe4All over the project lifetime, the partners propose the following recommendations for national and European policymakers and relevant stakeholders:

Mandate Inclusive OSH Trainings to all actors involved

- a. Develop inclusive, accessible, individual, tailored-made courses adapted for different learning needs to guarantee the maximum learning outcomes of all recipients. The course should cover disability awareness, effective communication, and the specific needs of persons with disabilities in emergency situations. The course should be given with a focus on supported communication, employing a metacognitive approach, in a fear-free space, with the involvement of trusted persons, and consideration of social space orientation.
- b. Educators and external disability experts who have followed the person's development and professional integration should be engaged in the delivery of this training, so it is truly accessible, adapted and user centred. In this way courses are given to the participant with differentiated instructions and context-specific case study examples, so they are taught about OSH measures in relation to their work or specific equipment they have to use. Confidence-building measures should take place in advance to ensure the participant is comfortable in the learning environment.
- c. Those leading the course should use plain language in verbal communication. It is equally important to plan for regular and sufficient break times. Repetition of content and practical exercises should be an integral part of the training. The retention of the material should be regularly monitored and assessed. In case participants express a lack of understanding, alternative delivery options should be explored.
- d. When developing OSH-related measures and policies, employers should start by mapping the risks present in the workplace environment, conducting an analysis of the needs of the individual worker vis-à-vis their tasks and responsibilities and identifying the reasonable adjustments required to ensure the health and safety of the employee. Risks considered must include ergonomic, chemical, biological, and psychosocial hazards. Then, develop an accompanied action plan to operationalise the training with specific goals, timeline, actions, key performance indicators, adaptations and financial resources to be allocated for effective implementation.
- e. Comprehensive and ongoing training programs should be provided to all actors involved, targeting especially:
 - a. Managers and staff, so they know how to support workers with disability, including those with a role to support the evacuation of employees in an emergency, and encouraging peer work.
 - b. Persons with disabilities themselves, so that they are aware of their rights and of the existing health and safety measures and policies in the workplace.
 - c. Employment and support service providers, labour inspectors, certified OSH trainers and professionals, so their competencies in disability-sensitive OSH are fine-tuned and bolstered.



- f. Mandatory disability training requirements for all employers will contribute to ensuring a common knowledgebase and understanding of disability inclusion in the workplace and place the responsibility to adapt not only on the employee but rather on the hiring environment, in line with the UNCRPD framing of disability.
- g. Collaboration of the European Union will be crucial to encourage member states to adopt common guidelines based on the above criteria to establish disability awareness trainings in all workplaces and for all relevant persons as indicated above, especially including occupational safety experts.

Revise existing OSH regulations and standards at the workplace

- a. Develop appropriate and effective health and safety measures (namely “reasonable accommodation” in line with Article 27 of the UNCRPD) to make sure people with disabilities can have access to the workplace on an equal basis with others. These standards should cover physical accessibility (e.g., ramps, elevators, accessible restrooms, work equipment), digital accessibility (e.g., accessible software and websites), and communication accessibility (e.g., sign language interpretation, easy-to-read information and easy-to-follow visual guidance). Psychosocial risk management must be part of such OSH management, to yield a truly holistic approach enabling of workplace health and safety for all.
- b. Inclusive health and safety planning and prevention requires revisiting general risk assessments and standard emergency procedures by adopting a co-production approach, ensuring that all key actors (e.g. employers, employees, including those with disabilities), DPOs (Disabled Persons Organizations) with expertise on the topic and other relevant experts) are involved in the process of drafting the workplace OSH framework. Tools such as the Online interactive Risk Assessment (OiRA) - which offers an accessible step-by-step approach to the risk assessment process - provided freely by EU OSHA, and other AI resources should be employed to facilitate this process.
- c. Recognising that employees with disabilities are not a homogeneous group and have different needs and preferences, it is key to make sure their diverse views and experiences are taken into account at all stages of development of OSH systems. Consultation should also engage disability experts OSH professionals when relevant related policies are negotiated at national and EU level.
- d. The EU should provide guidance and support to member states in developing and implementing consistent and harmonised accessibility standards across Europe to facilitate the effective inclusion of persons with disabilities in the workplace environment.
- e. Employers should be encouraged to go beyond legal requirements and implement measures that support the overall well-being of employees with disabilities. National OSH systems must be leveraged to support these good practices, so they are not regarded as an extra burden or cost. The EU should develop specific guidelines for employers on how to provide such ‘reasonable accommodations’ in the workplace, for different kinds of disabilities and different kinds of occupations, with attention to OSH training.
- f. OSH measures and policies developed in the workplace should be continuously monitored through key performance indicators so they are effectively implemented and updated when needed. Works Councils, trade unions, health and safety committees and employers’ organisations must also be involved in the implementation of said standards.



Establish Data collection and reporting requirements

Enforcing the above policies can only be achieved by:

- a. Systematically collect qualitative and quantitative data on workers with disabilities to be included in Eurofund 'Disability Statistics'. This data should focus specifically on their needs in relation to workplace health and safety, to identify gaps for improvement in OSH trainings provided and to assess working conditions. The data disaggregated by age, gender, and other relevant categories can be collected through conducting large-scale surveys - such as the European Working Conditions Surveys (EWCS) - and interviews.
- b. Assess the economic (and environmental if applicable) implications of inclusive OSH management policies systems, but also evaluate their impact on the well-being of workers with disabilities. This can be done by conducting a broad Social return on investment (SROI) study which measures the short- and longer-term effects of an inclusive OSH policy and training. It is crucial to validate the proposed policies financially; measurable successes are very important for all stakeholders and are a necessary motivator to invest and persevere in this direction.
- c. Mandate employers to communicate about and report on the evolving working conditions of persons with disabilities in a transparent, open and accessible manner. Data should encompass the rates of occupational accidents and diseases in comparable jobs for persons with and without disabilities. Rigorous information control and monitoring can be operationalised through measures such as but not limited to: informal stakeholder engagement, real-time reporting systems, regular audits, performance reviews, contract assessments and continuous feedback loops. Employers' organisations and trade unions as key labour market actors, as well as workplace employee representation and participation structures should be mobilised to fulfil these reporting requirements.
- d. Ensure effective oversight of enterprises' activities and impact by establishing independent monitoring and accountability mechanisms. Conduct regular labour inspections that encompass the disability aspect of OSH to report on workplace compliance with regulations related to disability inclusion in OSH trainings. Utilise technology to create efficient platforms that enable seamless communication and monitoring of workplace conditions, ensuring a swift response to emerging issues. This can be achieved by tracking employee retention and satisfaction as well as periodically reviewing policy effectiveness via feedback channels and pilot programs, depending on the suitability to the workplace environment.
- e. Foster collaboration and synergy between state entities, disability advocacy organisations, social economy entities and research institutions to collect, analyse, and disseminate up-to-date data on the needs and experiences of persons with disabilities in the workplace. Use such findings to inform future policies, necessary workplace adjustments, and adapted OSH training methods..
- f. Create channels for employees, especially workers with disabilities, to express complaints, grievances, and whistleblowing related to workplace misconduct or inappropriate OSH training. These channels should be designed to protect whistleblowers and ensure their complaints are taken seriously, fostering a discrimination-free work environment.



Raise Awareness and Foster Knowledge Sharing amongst diverse partners

To fight the endemic perception of low employability of persons with intellectual disabilities and to ensure their health and safety at work, the European Union should:

- a. Engage multiple stakeholders including employers, unions, job coaches, professional trainers, and persons with disabilities in efforts to implement inclusive OSH training. Emphasise practical, hands-on training methods in conjunction with a metacognitive approach to enhance effectiveness and receptivity.
- b. Advocate for legislative support from national, regional and local authorities to strengthen the protection of PwDs safety and health in the workplace. Push for far-reaching integration of the aforementioned proposals into the policy areas of welfare, health, work and the social economy. Bring those departments together to jointly look for project space and create solutions to make workplaces accessible, and innovation in reasonable accommodations.
- c. Translate policies into digestible information which can reach all relevant stakeholders by enriching the EU-OSHA 'OSH Campaign Toolkit' with appropriate content on workers with disabilities. The aim is to challenge existing stereotypes about PwD at the workplace, promote workplace safety, and promote good practice in OSH management and prevention. Leverage the activities of Work Integration Social Enterprises (WISEs) to build momentum and support for these objectives.
- d. Initiate comprehensive public awareness campaigns focused on workplace safety with an emphasis on disability inclusion. Using multiple communication channels - including but not limited to traditional media, social media platforms, online tools, campaigns and workshops - , employing accessible formats, and ensuring continuous two-way communication. Core messages should be adapted to the local context and supported by first-hand testimonies of primary beneficiaries.
- e. Provide clear and accessible guidance to companies and businesses on how to access state and European funding and assistance to enable job inclusion of persons with disabilities. Facilitate the process of securing financial resources to implement inclusive hiring practices.
- f. Establish a European pool of good practices and data coordinated by the EU OSHA, collecting success stories showcasing the benefits of inclusive OSH training and diversity in the workplace. This information should be made public and easily accessible by setting up a designated online platform. It is to become a place to celebrate successes and share positive stories related to the impact of the policies to inspire and motivate not only PwDs, but employees and staff. Regularly update and disseminate the information on the online platform to ensure continuous knowledge sharing and push for innovation among employers, services, and other stakeholders across Europe.
- g. Involve all important stakeholders from the various interlinked and overlapping sectors linked to OSH and disability - both private and public entities engaged in welfare, health, employment and the social economy- in national cross-sector task forces for every Member State. A national coordinator guides the task-force, to promote the timely exchange of information on research, practices and avenues for future improvements to OSH management that is inclusive of workers with disabilities.



Conclusions

Embracing the herein described inclusive approach to workplace health and safety fortifies the entire employment sector, the social economy and beyond. This approach reflects a proactive anticipation of the evolving labour market, acknowledging the impending needs of an ageing workforce, where employees may face challenges such as reduced mobility and increased psychosocial risks. By addressing these issues now, particularly through comprehensive OSH trainings tailored to inclusivity, a solid foundation with transferable applications to other sectors can be established. Inevitably, the [number](#) of persons with disabilities in Europe is on an upward trajectory. Rather than viewing employees with disabilities as a 'burden', the narrative must be reframed to showcase them as a valuable resource in an increasingly diverse labour market.

To truly create an inclusive workplace, systemic change is needed. Training regulations serve as a pivotal starting point for this transformative direction. Multilevel interventions are needed to put in place, enforce and monitor the implementation of such trainings. These are effective only if focused and adapted on the individual person, based on a holistic understanding of OSH. This moment presents a unique opportunity for European leaders to pioneer change in an era where 'Disability & Inclusion' risks remaining a hollow slogan, a detriment to the safety and health of thousands of workers with disabilities. By taking proactive steps, promoting awareness, revising standards, enhancing legal requirements, engaging stakeholders, and sharing best practices, Europe can establish a durable and sustainable framework.