



Inspection still a weak link in most national preventive strategies

Labour inspection as an institution emerged in 19th century industrialised societies¹. Today, it holds a central place in national prevention systems in all countries². Without labour inspection systems, there would be very little point to health and safety laws. One surprising feature of the changes in preventive systems over the past fifteen years is the little focus put on labour inspection in most European Union countries. Preventive measures have been extended to previously neglected areas, but the labour inspectorate staffing totals and responsibilities have seldom stayed in line with the new needs.

Also, labour inspection is constantly assailed by complaints about its inspection and enforcement responses from employers who want to be effectively let off scot-free for placing workers in danger. In some countries, government policies have undermined labour inspection resources. In some cases, inspectorates' responsibilities have been made

unclear by having an advisory role foisted on them in preference to inspection and enforcement. The European Court of Justice is also sending out disturbing signals in a deeply questionable judgement on surveillance of the work equipment market (see News in brief, p. 46).

This article is based on a survey done by our Department between December 2006 and February 2007 (see box).

No Community harmonization

There has been a radical shake-up in the rules on health and safety at work in all the countries examined over the past twenty years, mainly driven by carrying the Community directives over into national law. Labour inspection, by contrast, has remained essentially an individual Member State sphere of responsibility.

Description of the survey

The survey was done in the 27 EU countries plus Switzerland, Norway and Croatia. A questionnaire was sent out to the authorities responsible for labour inspection (30 bodies) and trade union confederations (approximately 70). It was also posted on our website so that individuals (mostly labour inspectors) and local organisations (mostly trade unions or associations of labour inspectors) could answer it.

From the 30 public bodies contacted, we received 14 replies (referred to here as "official replies"). From the trade union confederation side, we received 26 replies from 19 different countries (referred to as "union replies"). We received 12 replies from individuals (mostly labour inspectors) or specialised organisations (mostly trade unions/associations of labour inspectors) in 7 different countries. All told, of the 30 countries covered by the survey, only three (Ireland, Romania and Slovakia) sent no reply.

The best-case scenario was taken to be that of countries for which we received an official reply, a union reply and at least one individual reply from an inspector or association of inspectors. This made it possible to compare the different replies, which often provided complementary information. Only two countries – Portugal and the United Kingdom – fell into this class.

Six countries – Belgium, Bulgaria, Cyprus, Denmark, Estonia and the Netherlands – returned at least one official reply and one union reply.

In five countries – Cyprus, Lithuania, Luxembourg, Slovenia, Norway and Switzerland – only the official authorities sent in replies.

Replies from trade union confederations only were received from eight countries – Spain, Finland, Hungary, Latvia, Malta, Poland, the Czech Republic and Croatia.

Three countries – France, Italy and Sweden – returned both trade union replies and individual replies.

Individual replies only were sent from three countries – Germany, Austria and Greece. For Germany, the reply covered only the situation in one Land. The data we have are not necessarily representative for the whole of Germany.

Some respondents also sent in documents – like reports on activities and analytical articles – which helped fill out the replies to the questionnaire.

This information set was supplemented by documents held in the ETUI-REHS documentation centre.

¹ Few historians have explored the history of the labour inspectorate. One notable exception is: V. Viet, *Les Voltigeurs de la République. L'Inspection du travail en France jusqu'en 1914*, Paris, CNRS, 1994.

² See: W. Von Richthofen, *Labour Inspection. A guide to the profession*, Geneva, ILO, 2002.

The structure and operation of labour inspection systems in the different countries of Europe still differ in major ways that can best be accounted for by a range of factors.

Generalist inspectorate or specialised health and safety inspectorate

Generalist inspection systems tend to police compliance with all the rules governing employment relations. Specialised systems police only health and safety at work. But within each of these broad categories lie what may be significant differences.

Specialised inspection can address all health and safety issues, including work organisation and workers' representation in the company, or restrict its scope by taking a narrower approach to work hazards. The United Kingdom's inspection system, for example, has no remit for workers' safety representation, and responsibility only for some aspects of working time. This state of affairs is apt to encourage a narrowly technical approach to risks and overlook the workplace dynamics that enable effective prevention to be organised.

Single system or multiple participants

In some countries, labour inspection is carried out by a single corps of public servants. Other countries have other bodies whose activities complement those of the main inspectorate. This is particularly the case in the four biggest EU states. In France, Germany and Switzerland, action by the generalist labour inspectorate is supplemented by specialised inspection systems set up as part of social security system coverage of work-related risks. Italy has a twin-track system comprising the labour inspectorate (with a generalist remit, sponsored by the Ministry of Labour) and the national health system which, through its local units, also has inspection responsibilities for health and safety at work. The United Kingdom's main inspection agency (the Health and Safety Executive) exists alongside local authorities with specific responsibility for inspecting small and medium-sized service sector firms.

The labour inspectorate is not always a unitary body. Some countries (France, Luxembourg) have a specific inspectorate to police the activity of occupational health services. Belgium is a case apart with a state-run federal labour inspectorate split into different specialised branches (welfare at work, employment laws, social security, supervising the economic information provided to workers' reps, etc.). In Sweden, a specialised agency polices the regulations for chemicals used in workplaces and sold to consumers.

Some countries also have specialised inspection services for particular branches, like the transport inspectorates in France and the Netherlands. Labour inspection responsibilities may be performed by other organisations in some branches of the public service. Also, all European countries have specific

environmental inspectorates that also often have remits over workplaces (especially firms presenting major industrial accident hazards) or issue permits for certain business activities. Inspection of work equipment placed on the market was not included in our questionnaire. In some countries, this is mainly a labour inspection remit, while in others, it falls more to supervisory agencies run by the economic regulation authorities.

Coverage of all employed worker

Generally-speaking, transposition of the Community directives has improved the public services by extending the remit of labour inspection or creating specific inspection agencies in some branches. By contrast, the working conditions of some categories of workers are not policed by any inspection service. Most Community countries operate such exceptions for domestic workers and inmates working in prisons. The survey was not able to go more deeply into this issue, which requires further consideration at some future point.

It might also be instructive to determine how effectively labour inspection activity can be in production processes which combine employed and self-employed workers – a fairly common situation in construction, transport, agriculture, retail and other sectors.

Inspection ratios: disturbingly low in most countries

The questionnaire contained a series of questions on inspectorate staffing totals and the ratio of the number of inspectors to the number of workers and firms subject to inspection.

The first inescapable conclusion is that such figures are not always kept. This information was available in only 21 of the 27 countries for which we received replies. But where several replies were received for the same country, the differences between the sources tend to be very limited.

Taking the indicator of number of inspectors per million workers, countries can be classified into three groups. The variations between EU countries are significant. Taking the extremes, there is a variation from one to five between the lowest ratio countries (between 45 and 50 inspectors per million workers in Belgium, Spain, Hungary, Slovenia and the Netherlands) and the highest ratio ones (over 250 inspectors per million workers in three countries: Finland, Greece and Italy). This finding, however, needs to be qualified by a more detailed analysis of the structures and tasks of the different inspection systems. The International Labour Office (ILO) finds cause for concern in those industrialised countries, where the inspector-to-worker ratio is below 100 inspectors per million workers³. That is the case for 11 of the 22 states for which our survey returned data.

³ ILO, press release, 16 November 2006, ref. ILO/06/52.

But the basic “inspectors-per-million-workers” ratio is not a conclusive indicator of the front-line labour inspection ratio. The British trade union reply emphasizes this point, and observes that out of a total Health and Safety Executive (HSE) staff of more than 1500, only 900 inspectors are active in workplace inspections.

The “inspectors-per-100 000-firms” ratio is a useful pointer to the labour inspection enforcement capacity faced with the increasing complexity of production processes and, especially the legal fragmentation of firms through subcontracting networks. The Polish statistics which reveal the difficulty of ensuring proper monitoring are relevant here. In 1995, the labour inspectorate carried out inspection visits in 54 550 firms, accounting for just over 5 172 363 workers. In 2005, the number of visits had increased by just over 10% compared to 1995, rising to 66 693. But the number of workers concerned had fallen by approximately a third to 3 393 532. Many replies call attention to this problem: even where inspectorate staffing totals are unchanged or slightly up, the needs-resources gap continues to widen.

One thing that is totally missing is uniform indicators at European level. The data on inspection ratios (measured per number of workers and firms covered) need supplementing with more systematically-collected data on inspections carried out on health and safety at work. This kind of data was sent in for a few countries only. The methodology used to collect these data differs from one country to another. Few countries have successfully evaluated the statistical probability of an inspection visit of a randomly-selected workplace in a given year. It would be helpful if far more self-consistent statistical indicators were compiled as part of the Community strategy.

Staffing total trends

The replies on staffing total trends reveal wide between-country variations. National situations are not moving closer together, in that countries with the lowest inspector ratios may also be those where staffing totals are falling. Short-term swings are difficult to interpret: a sudden rise or fall may just be a correction from an opposite trend in previous years. Beyond these annual variations, the general long-term trend is that the role of labour inspection is being under-rated in national prevention strategy roll-out.

There are three factors common to all countries:

- the fragmentation of production channels, not least through subcontracting;
- the increased complexity of inspection work from legislation that is less about the “nuts-and-bolts” and imposes management obligations in the broad sense (risk assessment, consultation of workers, implementation of preventive services, etc.);

Number of inspectors per million workers *

Low ratio (under 100)	Medium ratio (100-200)	High ratio (over 200)
Germany ^a	United Kingdom	Denmark
Belgium ^b	Sweden	Finland
Spain	Austria	Italy
Hungary	Estonia	Greece
Slovenia	Latvia	
Netherlands	Poland ^d	
Portugal	Norway	
Malta		
Luxembourg		
France ^c		

* Countries are ranked by ascending order in each column.

a. The reply relates to only one Land and does not include mutual insurance fund officers.

b. The reply relates only to specific health and safety at work inspectors.

c. The reply does not include the regional sickness insurance fund (CRAM) inspection officers. It says that the labour inspection development plan should increase the inspectors- per-million-workers ratio from 94 in 2006 to 148 in 2010.

d. The Polish trade union reply states that of the 2439 labour inspection staff, 1457 are engaged in workplace inspection activities. On this basis, Poland has been classed as “medium ratio”.

- expansion of the scope of health and safety at work to include such things as mental health problems, a focus on harassment and different forms of psychological violence, etc.

Such a situation requires an expansion of inspectorates’ staffing totals and areas of competency. There is no clearly-distinguishable Europe-wide trend in staffing totals, but most of the national replies claim that inspectorates are sometimes drastically understaffed. As to areas of competency, it will be seen below that there are also serious gaps in most countries.

As far as staffing total trends go, the overwhelming impression is of a lack of any real strategic planning by States. In many countries, trends are uneven. Labour inspection is neglected and staffing totals decline in cycles that can extend for five to ten years. These cycles are halted in times of crisis or when specific events like a disaster or “unexpected” rise in fatal accident rates elicits a knee-jerk public policy response in the form of a recruitment drive to at least partially offset the deepening staff shortage. This kind of reactive policy offers no way of achieving structural consolidation in labour inspection. It is a fire fighting strategy.

Areas of competency

The questionnaire asked for a rating of the professional expertise available. It listed six types, with scope for adding others. Replies for each type of competency could range from 5 to 0. The average score for all six types of competency listed in the questionnaire was 2.77, with wide variations between types. The most commonly-found type was safety engineer (average score: 3.94) followed by lawyers (3.35). Two other types of expertise had average scores over 2.5 – industrial hygienists (2.80) and occupational doctors (2.66). Two areas seem fairly disregarded,

failing to achieve an average score of 2.5 – ergonomists (2.33) and psychologists (1.51).

While a high level of safety engineers is found almost uniformly across Europe, the presence of occupational doctors is much more variable. They are well-represented in some countries (Belgium, Italy, Cyprus) and practically non-existent in others (Denmark). In some countries, assessments are sharply divided. In the United Kingdom, for example, the official reply claims that occupational doctors are very well represented within the inspectorate, whereas the other replies give a much less rosy assessment. The sanguine official view is not borne out by a literature review – much of the medical competency previously possessed by the HSE appears to have been dispensed with.

Areas of activity

Analysis of the areas of labour inspection activity shows them broadly to be focused on work accidents and other safety issues. Chemical hazards are less systematically inspected for. Psychosocial and ergonomic risks are only really priorities in a minority of countries.

This distribution of labour inspection activities is borne out by the national statistics where they break down inspections by category. For example, Belgium's labour inspection report for 2005 indicates that out of 7394 cases handled, 3083 (42%) involved work accidents.

Obstacles

Picking out the obstacles to efficient labour inspection is less easy. The average score for all the factors

listed in the questionnaire was just short of 3 (2.96) on a scale from 5 (situation very good, no significant obstacle from this factor) to 0 (situation very bad, this factor is a major obstacle). The specific score for each factor tends to hover around the average score.

Three factors receive a somewhat more critical rating (around 2.5):

- ability of appropriate policy-makers to frame a specific, effective policy to support labour inspection activities;
- time available to inspectors to inspect workplaces;
- effectiveness of legal penalties for contraventions reported by inspectors.

It is this latter factor that gets the least favourable assessment and lowest scores (0 or 1), especially from respondents who are inspectors or associations/trade unions of inspectors. This rating is borne out by the additional documents supplied, especially the activity reports published annually by labour inspection authorities in different countries. They reveal that labour inspection non-compliance reports are rarely followed by a court case, and that most contraventions reported go effectively unpunished.

Some countries have administrative fines on top of legal penalties. Although easier to levy, they seem to be little used. The Netherlands labour inspection authority report for 2005, for example, reports that just over 5000 administrative fines were imposed in that year. Just under half (2433) related to health and safety at work, and they amounted to just under 7 million euros (roughly averaging 285 euros per contravention fined). Administrative fines levied for breach of the foreign workers employment legislation were very similar in number, but markedly higher in total amount (over 13.2 million euros). The

Inspection activities: average score over all replies	
Investigation of a serious or fatal work accident	4.24
Action related to safety other than accident investigations	3.32
Action related to chemical hazards with immediate or short-term effects	3.22
Control of the contents of risk assessments and drawing up of prevention plans	3.20
Control of workplace health and safety management	3.12
Checking compliance with the rules on consultation and representation of workers	2.86
Control of workers' health and safety information and training	2.86
Substitution of dangerous substances like carcinogens or reprotoxins by non-dangerous or less dangerous substances	2.73
Checking compliance with exposure limits	2.71
Control of temporary workers' health and safety conditions	2.71
Action related to ergonomic problems	2.33
Control of preventive services' activity in regard to health surveillance	2.52
Control of preventive services' activity other than health surveillance	2.15
Action related to psychosocial risks, especially different forms of violence and harassment	1.98

same report emphasizes that the inspectorate gives a marked preference to “light hand” intervention. Where a contravention is found during an inspection visit, non-penalty enforcement measures (warning, prohibition notice) are used in over 80% of cases. “Punitive measures” were applied in just under 20% of cases. In 10% of the cases, inspectors ordered work to be halted. In 4% of cases, they levied an administrative fine. In 4% of cases, they combined halting work with an administrative fine or a report to the prosecution authorities. In just 1% of cases, they wrote up a non-compliance report. Where a contravention is established in connection with a serious or fatal accident, by contrast, administrative fines or reports are much more common (56% of investigations into such accidents result in “punitive” action). This reflects a more reactive than preventive approach, in that the most deterrent measures tend to be used for contraventions that result in deaths or serious injuries, and not for putting workers at risk.

Some countries have sought to lessen the degree to which employers escape liability by improving the linkages between the justice system and labour inspection, and by creating specialised units within the court system to prosecute health and safety offences. Spain’s central prosecution service has been given a specialised section in all geographical districts. The trade unions work directly with these specialised prosecutors to bring the force of criminal law to bear on employers who flout their prevention obligations. One specific aim of the action plan for prevention recently adopted in Spain is to improve the linkages between the labour inspection authority and these specialised sections of the prosecution service⁴.

Some other factors not mentioned in the questionnaire were reported by respondents, such as no or too little co-operation with workers’ safety reps (especially in the United Kingdom). This key aspect will be looked at further below. Some replies took issue with the age structure of labour inspection staff, raising fears of a rapid decline in the service from a failure to recruit enough new inspectors. In Belgium, for example, the average age of all inspectorate staff was 50 years in 2005 and, by the end of 2006, 18% of the staff were aged 60. Assessments of factors internal to inspectorates (initial training, continuing training, relations between inspectors and their superiors) tended to be more favourable. The Finnish reply, by contrast, reported a conflict between the labour inspection service and its sponsoring ministry. The recent European Court of Justice ruling on surveillance of the work equipment market reveals how helpless inspectors are when their job is obstructed by superiors reluctant to lock horns with employers.

Relations with the other participants in prevention

It is not feasible to have labour inspectors permanently sited in each workplace. Relations between

inspectors and the other participants in prevention are therefore key to the effectiveness of inspection systems. This may seem to go without saying, but it does reveal significant differences of approach between inspection services.

Some systems seem to focus on relations with employers, providing them with encouragement, advice and support. This kind of approach is all about not putting the frighteners on employers, and speaking their language by showing that a proper health and safety policy will boost their profit margin. Enforcement is used only reluctantly. The inspectorate’s function may become muddled, turning it into a sort of free health and safety at work consultancy paid for out of the public purse. In the United Kingdom, for instance, the labour inspection authority played a sometimes very equivocal role when the Community directives were being transposed by intimating to employers that it would not be officious in punishing contraventions.

Relations with the employer are not just about the priorities assigned to inspection or advice. Over and above this policy issue must be considered the ability of the inspection service to act on the quality of OHS management. The framework directive and the national reforms which accompanied its implementation highlight the importance of systematic, planned and participatory management. Four key components of this management play a special role: risk assessment, planning of preventive measures, taking prevention requirements into account in corporate strategizing, consultation of workers and their representatives on all issues likely to affect health and safety at work. There is an important need to distinguish two debates here. One is about the place of enforcement measures and penalties in inspection policies. The other concerns the importance of holistic health and safety management versus specific tangible aspects. There is no automatically right answer to these two problems⁵. Tight checks on managerial organization or advice on breaches of particular technical specifications are equally possible approaches. Taking health and safety into account as a management system involves redefining some basic types of competency in the inspection service: an ability to audit material aspects of management systems, the power to intervene in company labour relations practices, a grip on risk assessment issues. The “interpersonal relations” aspect of the inspectorate’s work takes on a very particular importance. Unless these abilities are developed and the necessary time found to put them into practice, inspections are likely to be confined to ticking off the boxes for the existence of selected procedures and documents without judging their effectiveness. This failing may be exacerbated by the tendency in some States to expand certification by commercial organisations, which marginalises the role of labour inspection. This debate is reflected in two issues in very many Community countries.

⁴ *Plan de acción para el impulso y la ejecución de la estrategia española de seguridad y salud en el trabajo (2007-2012). (Periodo julio 2007-abril 2008), Madrid, 25 July 2007.*

⁵ For a more comprehensive discussion, see A. Bruhn, *The inspector’s dilemma under regulated self-regulation, Policy and Practice in Health and Safety*, Vol. 4, No. 2, 2006, p. 3-23.

One is the role of labour inspection in relation to risk assessment⁶; the other is the importance of a systematic policy of support for workers' reps by the labour inspection service.

Most occupational ill-health develops in a context of adversarial workplace relations. To be effective, labour inspection should support the activity of workers and their trade unions to improve working conditions. It should ensure that workers' collective rights to information, training and consultation are respected. It should be based on active co-operation between the inspection system and the system for trade union representation of workers in health and safety. No European inspection system takes this approach in any material way. Some, however, are more receptive to it and appreciate the importance of action that also includes the prevailing system of labour relations in firms. Empirical data from several countries tend to show that firms which have workers' representation in health and safety also most invariably operate a prevention policy.

In some Central and Eastern European countries, this debate has also focused on a specific institution, a partial legacy of the past, whose redeployment in a new context could be a big asset for prevention. In some of these countries, what are known as "worker inspectors" play a special role. In truth, the institution's origins lie much further back in time. It emerged in the industrialised countries of western Europe at the end of the 19th century and had long been a central demand of the trade unions in France, Germany and England⁷. The trade unions had secured recognition for union reps to act as inspectors under a variety of names in industries like mining. In some cases, these worker inspectors held auxiliary posts within the general labour inspection authority. The evidence is that this institution made a major contribution to prevention provided there was a clear demarcation of roles between the collective representation of workers and enforcement of legislation. In most former Soviet bloc countries, the labour inspection system had forged close ties with the trade unions and was partly based on the activity of these "worker inspectors". This relationship was not clear-cut inasmuch as the trade unions tended to operate as an extension of the Party and State authorities. The worker inspectors often sought to play down company management's liability for accidents and blame them on mistakes by individual workers. The revival of independent trade unions ought to have given a new impetus to this institution.

The worker inspection system was heavily run-down during the transition towards capitalism and has completely disappeared in some countries. In Poland, it has struggled to stay alive in firms with trade union representation⁸, but remains highly active in the mining industry in the Czech Republic.

The International Labour Organisation (ILO) has often played an unclear role in relation to attempts in some countries to forge closer links between the labour inspection authority and the unions. In Luxembourg, for example, an ILO audit of the labour inspection service in 2002 criticised the appointment of labour inspectors on proposals from representative trade unions. ILO missions in Central and Eastern European countries have recommended that trade union inspection systems be dismantled on the basis of quite shaky reasoning⁹.

Far from being a quirk of former Soviet bloc countries, the worker inspection system could in many ways strengthen preventive strategies in the countries of Western Europe. Although lacking such wide-ranging powers, the district workers' safety reps in Sweden carry out some labour inspection-like tasks by running legislation enforcement campaigns in some areas. Generally, the right to stop work in case of serious and imminent danger has also been defined in some (mainly Nordic) countries as a collective right exercised by workers' reps. It is a power that has some similarities with labour inspection activity and is a very useful supplement to it in enabling very rapid action in circumstances where any delay may have serious consequences. The Australian system is informative here¹⁰. Workers' safety reps in a number of Australian States have the right to serve provisional improvement notices (PINs) on the employer. If he does not agree with the improvement notice, he can call in the labour inspection service. The scheme has yielded encouraging results. Surveys done by the Australian trade unions show that in the vast bulk of cases, a PIN has resulted in preventive measures being taken. In most of the cases where the employer has appealed to the labour inspection authority, it has upheld the PIN on the grounds of a real failing in prevention.

Relations with preventive services are also a key issue. Many replies describe them as unsatisfactory, either because the labour inspection service fails totally to inspect preventive service activities, or because it merely checks their nominal compliance with the conditions of approval. Generally, there is no real joined-up working between preventive and labour inspection services. The situation is certainly made worse by the fact that the framework directive has not been fully transposed in several countries where the necessary competencies of preventive services have not been defined at all or couched in much too general terms (Sweden, the United Kingdom and Ireland are particular cases in point). The fundamental questions are: How to define the public role of these services which are generally controlled by employers? How to collectivise the experience of these services so as to avoid fragmentation of their activities by individual workplaces? This is an issue that far transcends the bounds of the discussion on the strategy of labour inspection.

⁶ See in particular Vincent Tiano's thesis, *Les inspecteurs du travail à l'épreuve de l'évaluation des risques : une profession sous tension*, sociology thesis, University of Aix-Marseille II, 2003. See also: V. Tiano, *Les inspecteurs du travail aux prises avec l'évaluation des risques*, *Travail et emploi*, No. 96, October 2003, p. 67-83.

⁷ See P. Aries, *Inspection du travail et Inspection ouvrière dans le discours de la CGT de la genèse de l'institution à l'entre-deux-guerres*, *Droit et société*, No. 33/1996, p. 389-404.

⁸ See in particular: INTEPF, *Les relations de travail en Pologne : évolution et perspectives*, Journal du voyage d'étude effectué du 4 au 11 juin 2000, Institut national du travail, de l'emploi et de la formation professionnelle.

⁹ See in particular: International Labour Organization, *The Role of Labour Inspection in Transition Economies*, Document No. 48, 1998.

¹⁰ For a detailed review, see: S. Page, *Worker Participation in Health & Safety. A review of Australian provisions for worker health & safety representation*, HSE, 2002. This report is based on an analysis of the situation in the State of Victoria.



Italy is a case apart, with two very different types of preventive services existing alongside each other. One is the public prevention services established as part of the 1978 health reforms. These services are highly active in developing workplace health and safety and have the powers and competencies of a labour inspection authority in health and safety matters. The other is the preventive services set up under new legislation passed in 1996. These are company in-house services that may enlist external consultancy expertise. There are almost no private inter-company preventive services.

Belgian employers must appoint a specialized prevention advisor as part of their in-house service or enlisted from an external intercompany service specifically for prevention of the different forms of harassment and violence at work¹¹. This prevention advisor must notify the labour inspection service of situations where the employer has not taken appropriate measures to put an end to situations of harassment or violence.

On from lip-service recognition

Looking beyond the lip-service recognition of the importance of labour inspection, it is clear that there is a big gap in the comparative study of labour inspection in Europe. Quantitative indicators are sadly wanting. Systematic studies on the requirements for effective intervention are even thinner on the ground¹². More sources and parliamentary reports are available at individual country level.

The survey done by our department was very limited in scope. The aim was to collect assessments from different participants on selected aspects of inspection activity. It enables only a few proposals to be sketched out for future research and for policy debates on preventive strategies.

Above all, the survey findings raise major issues of coherence.

1. There is a yawning gulf between the known health outcomes of work and the focus in practice on accidents. In areas like prevention of chemical hazards, action on psychosocial factors or the health impact of the spread of contingent employment, there is a big job of work for labour inspection to do in defining effective interventions. The lower visibility of the poor long-term health outcomes of working conditions is apt to weaken policy-makers' support for any such debate;
2. Even where work accidents are concerned, labour inspection activity seems much more reactive than preventive. And that reactivity is itself heavily undermined by the difficulty of achieving effective penalties;
3. Relations between labour inspection and the workplace participants in prevention – especially the trade unions – are haphazard. A major potential for joined-up working is not being put to use. ■

Laurent Vogel, Researcher, ETUI-REHS
lvogel@etui-rehs.org

¹¹ Protection against Violence and Psychological or Sexual Harassment at Work Act of 11 June 2002, *Belgian Official Gazette*, 22 June 2002.

¹² Notable exceptions are the following article and the odd studies cited in its bibliography: L. Lindblom and S.O. Hansson, *Evaluating workplace inspections, Policy and Practice in Health and Safety*, 2004, p. 77-91.