

# Review of the Working Time Directive (Directive 2003/88/EC)

## IOSH response to the European Commission consultation



Submission

15.03.15



## Introduction

The Institution of Occupational Safety and Health (IOSH), the Chartered body for health and safety professionals, welcomes this opportunity to contribute to this important European Commission *Review of the Working Time Directive (Directive 2003/88/EC)*.

In the submission that follows, we provide our summary positions on working time and on this 2015 EC consultation; answers to the specific consultation questions; some references; and further information about IOSH.

## Summary IOSH position on working time

- IOSH supports sensible working time management and effective worker protection.
- IOSH believes that any cost associated with sensible working time management will ultimately be more than offset by the many benefits (individual, business and societal) of better safety, health, productivity, reputation, resilience and results.
- IOSH recognises the positive benefits to health and wellbeing that rewarding employment can bring, but believe that working excessive working hours can adversely affect workers' health and wellbeing, safety and performance.
- IOSH believes that occupational safety and health practitioners can provide valuable advice to managers to help ensure that working time arrangements do not compromise the health and safety of workers and others.
- IOSH recommends that a code of practice would be more persuasive than guidance in helping ensure good health and safety practice from any employers who may not be inclined to otherwise adopt it.
- IOSH proposes that health assessment entitlement offered to night shift workers should also be offered to all those working consistently long hours, supported by adequate occupational health advice.
- IOSH does not think employers should be able to include an opt out clause when giving new employees their employment contracts, as workers need to make considered and free choices on this.
- IOSH urges employers to make sure employees who choose to opt out of the 48 hour limit are aware that they can cancel their agreement at any time, but must give at least 7 days' notice (or longer if so agreed).
- IOSH emphasises that working hours should be monitored and properly managed, so that employers can help workers achieve a healthy work-life balance.
- IOSH advocates the benefits of flexible working arrangements, both for the employer and the employee, which can include arrangements such as remote working, flexi-time or job-sharing.

## Summary IOSH positions on the EC 2015 consultation topics

1. Multiple contracts – the Working Time Directive should stipulate that working time rules apply per worker where they have more than one contract
2. On-call time – should be codified so that all on-call time counts as working time
3. Stand-by time – should partially count stand-by time as working time
4. Compensatory rest – should be codified that compensatory rest has to be granted promptly after extended work periods
5. Reference period – should remain as now (i.e. 4 months and in certain sectors, up to 6 months and by collective agreement up to 12 months) and not be generally extended
6. Opt-out – should remain, but have stricter worker protection
7. Autonomous worker – should be clearly defined, adequately supported and monitored
8. Emergency services – retain current provision i.e. working time only applies in normal operations, not in catastrophes or disasters; however, the latter should be prepared for as much as possible
9. Healthcare – there should be a more narrow derogation to improve patient safety (and worker wellbeing)
10. New working arrangements – all hours worked need to be responsibly managed and monitored (whether under flexi, zero hours, tele or other arrangements)
11. Requests – we support the proposed rights for workers to have their requests for working time arrangements duly considered by employers
12. Shifts – we recommend that use of 12 hour shifts is minimised and where used, that more frequent breaks are given (i.e. shorter shifts or more frequent breaks)
13. Other – we also suggest that free health assessments are offered to those who are working consistently long hours, similar to those offered to night shift workers

## IOSH responses to EC review consultation questions

### 1. Objectives and approach to the review of the Working Time Directive

#### 1. A. Impact of the Working Time Directive

*In your opinion, what is the impact of the current Working Time Directive giving workers the right to a limit to average weekly working time (currently set at 48 hours) and to minimum daily and weekly rest periods?*

	Fully disagree	Tend to disagree	No opinion	Tend to agree	Fully agree
It protects the health and safety of workers and people they work with				✓	
It ensures a level playing field in working conditions across the Single Market, avoiding that countries lower their labour standards to gain a competitive advantage				✓	
It boosts productivity notably by fostering a healthy European workforce				✓	
It allows flexible organization of working time					✓
It allows workers to reconcile work and private life				✓	
It impacts on job creation				✓	
Self-employment is used to circumvent the application of the limits imposed by the Directive				✓	
It impacts the costs of running a business			✓		
It has no major impact	✓				

Please elaborate on your opinion with regard to the impact on health and safety of workers and people they work with 300 character(s) maximum

[Optional]

IOSH supports sensible working time management and effective worker protection. We believe that excessive hours or poorly designed working time arrangements can negatively affect health and safety (EC, 2010) and so we support the aim of the Working Time Directive (WTD) and transposed regulations to tackle this. We are concerned that, because of variable implementation and use of the 'opt-out', there may be situations where it is only effective in principle, not practice.

Please elaborate on your opinion with regard to the impact on job creation

300 character(s) maximum

[Optional]

IOSH notes from Deloitte (2010) that it is difficult to judge WTD's impact on public sector job creation, because of the effect of cut backs and supply-side specialised labour shortage, meaning that "...the strong demand for doctors and nurses has only partly resulted in the creation of extra jobs." Notwithstanding this, clearly, if workers aren't working excessive hours, this should mean there is more work available for others.

Please elaborate on your opinion with regard to the impact on the cost of running a business

300 character(s) maximum

[Optional]

IOSH believes that any cost associated with sensible working time management will ultimately be more than offset by the many benefits (individual, business and societal) of better safety, health, productivity, reputation, resilience and results.

## 2. Thematic questions

### 2. A. Scope

#### Concurrent contracts

***A single worker may be employed under several concurrent contracts. Should the limits provided in the Working Time Directive apply to all contracts taken together or to each contract separately?***

***If the Directive applies per worker, this means for example that all the hours worked under the different contracts should be added together and cannot exceed 48 hours on average (unless the worker signed an opt-out).***

***If the Directive applies per contract, this means for example that the worker can work 48 hours on average under each separate contract without an upper limit. \****

[only one answer possible]

	It is up to Member States to decide whether working time rules shall apply per worker or per contract
	The Directive should stipulate that working time rules shall apply per worker in situations where a worker has more than 1 contract with the same employer
✓	The Directive should stipulate that working time rules shall apply per worker in situations where a worker has more than 1 contract in any event
	The Directive should make it clear that it only applies per contract
	Other
	Do not know

Please specify\*

300 character(s) maximum

IOSH believes working time rules should apply per worker in situations where workers have more than one contract. Workers may have multiple contracts with the same and/or different employers and so employers need to make enquiries about their employees' total work commitments, in order to help manage risks to health and safety.

## 2. B. Concept of working time

### On-call time

*On-call time corresponds to any period where the worker is required to remain at the workplace (or another place designated by the employer) and has to be ready to provide services. An example could be a doctor staying overnight at the hospital, where he can rest if there is no need to attend to patients.*

*Under the current Working Time Directive, as interpreted by the Court of Justice, on-call time is fully regarded as working time for the purpose of the Directive, regardless of whether active services are provided during that time. The period of on-call time within which the worker actively provides services is usually referred to as 'active on-call time', while the period within which services are not provided can be referred to as 'inactive on-call time'.*

*(See in particular Cases C-303/98 Simap C-151/02 Jaeger C-14/04 Dellas)*

Please give your opinion on the following options as regards possible changes in the treatment of on-call time under the Working Time Directive:

	Very undesirable	Undesirable	No preference	Desirable	Very desirable
No change to the current rules		✓			
Incorporate the interpretation of the Court into the Directive (i.e. codification to clarify that all on-call time has to be counted as working time)					✓
Set the principle that defining "on-call time" should be agreed in each sector by national social partners, for example determining that only part of inactive on-call time will be counted as working time		✓			

If you would like to add comments or indicate another option, please specify:

500 character(s) maximum

[Optional]

IOSH believes it would be helpful to codify that all on-call time is counted in order to protect workers' health and safety and to ensure a level playing field in the EU. Workers who are required to be at a certain place and 'ready to respond' will experience resulting fatigue and disruption to social / family life (regardless of whether they are required to provide active service) and these hours should be accounted for.

### Stand-by time

***Stand-by time corresponds to any period where the worker is not required to remain at the workplace, but has to be contactable and ready to provide services. An example could be when a technician of a nuclear facility is at home, but has to be ready to come to the plant to provide services in an emergency.***

***Under the current Working Time Directive, as interpreted by the Court of Justice, stand-by time does not have to be considered as working time for the purpose of the Directive. Only active stand-by time, i.e. time in which the worker responds to a call, has to be fully counted as working time.***

***(See in particular Cases C-303/98 Simap C-151/02 Jaeger C-14/04 Dellas)***

Please give your opinion on the following options as regards possible changes in the treatment of stand-by time under the Working Time Directive:

	Very undesirable	Undesirable	No preference	Desirable	Very desirable
No change to the current rules	✓				
Incorporate the interpretation of the Court into the Directive (i.e. codification to clarify that stand-by time does not have to be considered working time)	✓				
Introducing the obligation to partially count stand-by time as working time for the purpose of the Directive					✓
Introducing a limit to the maximum number of hours that a worker may be required to be on stand-by in a given period (for instance 24 hours a week), together with a derogation possibility to set a different limit via collective agreements			✓		

If you would like to add comments or indicate another option, please specify:

500 character(s) maximum

[Optional]

IOSH believes that requiring a worker to be on stand-by at home or away from the workplace will impact home and social life and requires a 'being ready' mind-set that is not conducive to completely 'switching off'. The result is that even if not 'called on' to provide active service, this commitment can be tiring and impact personal life and should 'partially' count as working time.

## 2.C Derogations

### Compensatory rest

*Under the current Working Time Directive, as interpreted by the Court of Justice, a worker who by derogation from the general rules has not received his/her minimum daily rest of 11 consecutive hours in a 24-hour period, will have to receive an equivalent period of compensatory rest (i.e. 11 hours) directly after finishing the extended working time period. This sets a maximum of 24 hours to a single consecutive shift.*

*(See in particular Case C-151/02 Jaeger)*

How would you assess the possible introduction in the Working Time Directive of provisions regarding the period within which such a compensatory rest has to be taken:

	Very undesirable	Undesirable	No preference	Desirable	Very desirable
No change to the current rules		✓			
Incorporate the interpretation of the Court into the Directive (i.e. codification to clarify that compensatory rest has to be granted immediately after the extended period of work)					✓
Allowing employers the possibility of granting compensatory rest within 2 days		✓			
Allowing the possibility of granting compensatory rest within 4 days	✓				

If you would like to add comments or indicate another option:

500 character(s) maximum

[Optional]

IOSH believes that delaying compensatory rest is likely to mean that the worker concerned is fatigued when working and so is at health and safety risk, as well as potentially posing a risk to others. Employers also need to ensure that there is adequate 'handover' time between shifts, in order to avoid situations where workers need to stay on into their rest time to achieve this.

### Reference period

*The limit to weekly working time of 48 hours provided by the Working Time Directive is a limit to average working time. This means that in certain weeks the worker can be required to work more than 48 hours as long as this is balanced out by lower hours in other weeks. This average has to be calculated over a certain period, i.e. 'a reference period'. Currently, the standard limit to the reference period is 4 months, which can in certain sectors be extended by law up to 6 months, and by collective agreement it can be set up to 12 months.*

What would be in your view the most appropriate approach to the limit set to the reference period to calculate average weekly working time:

[only one answer possible]

<input checked="" type="checkbox"/>	No change in the current provisions
<input type="checkbox"/>	Allow that reference periods can be set up to 6 months by law in any sector, and maintain that they can only be set up to 12 months by collective agreements
<input type="checkbox"/>	Maintain that reference periods can be set up to 4 months by law in any sector, but allow that reference periods can be set up to 12 months by law in certain specific sectors (e.g. to take into account the size of the undertaking or to take into account fluctuations of demand)
<input type="checkbox"/>	Allow both previous options (i.e. option 2 and option 3), meaning that reference periods can be set up to 6 months by law for any sector and up to 12 months by law in certain specific sectors
<input type="checkbox"/>	Allow that reference periods can be set up to 12 months by law in any sector
<input type="checkbox"/>	Other
<input type="checkbox"/>	Do not know

Please specify\*

300 character(s) maximum

IOSH believes that it is not always appropriate to extend the reference period, particularly where safety-critical work is involved. So, we suggest this requirement should be left as it is i.e. only extended in certain sectors or with workers collective agreement. Employers need to be aware of the potentially increased risks to health and safety where extended reference periods are used and to monitor and manage such situations safely.

## Opt-out

***Under the current Working Time Directive, Member States have the possibility not to apply the limit to average weekly working time of 48 hours, when the worker agrees to it individually and freely with the employer, and does not suffer prejudice for revoking such agreement (the 'opt-out').***

What is your view on this opt-out clause:\*

[only one answer possible]

	It should be maintained unchanged
✓	It should be maintained, but stricter conditions for the protection of the worker should be added in the Directive
	It should be maintained, but it should be provided in the Directive that the opt-out cannot be combined with other derogations under the current Directive
	It should be abolished, but in compensation there should be additional derogations made available for employers (e.g. allowing not to count on-call time fully as working time)
	It should be abolished
	Other
	Do not know

Please specify\*

300 character(s) maximum

IOSH notes the finding that 13% of those usually working over 48 hours per week would prefer 48 or fewer, even if it meant less pay (BIS, 2014). Also, the report that accident risk increases disproportionately beyond 8 working hours per day and that longer work is only acceptable with adequate rest (Deloitte, 2010). We believe hours should be monitored and recorded and workers shouldn't feel employer-pressure to work longer than they wish.

## Autonomous workers

***"Autonomous workers", such as for example managing executives, can fully determine their own working time (i.e. decide when and how many hours they work). Member States have the option to apply the main provisions of the Working Time Directive to these workers.***

Please choose the most appropriate statement according to your views:\*

[only one answer possible]

	The current Working Time Directive provides an adequate exemption as regards autonomous workers, and should not be changed
✓	The current exemption should be maintained in substance, but more clearly formulated, in order to enhance legal clarity and to prevent abuse
	The definition of autonomous workers is too narrow and should be expanded to other categories of workers who should be exempted too
	The definition of autonomous workers is too wide and should be limited
	Other
	Do not know

Please specify\*

300 character(s) maximum

IOSH believes that employers need to take a responsible approach to ensuring that their 'autonomous' workers have sufficient support and that their health, safety and wellbeing (or that of others affected by their activities) is not compromised by them working excessive hours. This requires monitoring of working time and a clearer definition of 'autonomous worker' would also be helpful.

## 2.D Specific sectors/activities

### Emergency services

*The current Working Time Directive as interpreted by the Court of Justice applies to workers in emergency services, e.g. civil protection services like fire-fighting services, in the normal operation of these services. The current Directive contains several derogations that can be applied to the working time and rest periods of these workers in order to ensure the effective provision of these services. In the event of a catastrophe/disaster, the Working Time Directive does not apply at all.*

*(See in particular Cases C 397/01 to C 403/01 Pfeiffer and Case C-52/04 Feuerwehr Hamburg)*

Please state your view on the application of the Directive to emergency services:\*

[only one answer possible]

✓	The current rules adequately balance the need to protect the health and safety of the workers and the people they work with/for with the need to guarantee effective provision of emergency services, and should remain unchanged
	The current rules should be maintained in substance, but clarified in light of the case law of the Court of Justice, to improve legal certainty
	There should be additional derogations applicable to all or some categories of these workers, addressing their specific situation
	The Working Time Directive should not be applied to workers in emergency services
	Other
	Do not know

Please specify:\*

300 character(s) maximum

IOSH supports current provisions. We believe that in disasters and catastrophes, flexibility and preparedness will be needed to ensure public safety and health. Employers must ensure that these types of major emergency situations are planned for and resourced, as far as feasible, so that there is adequate contingency and emergency workers don't become too fatigued or overwhelmed to function effectively.

### Health care sector

*The current Working Time Directive provides a derogation for health care services when they require continuity of service, meaning particularly that the rest periods of health care staff can be postponed to some extent.*

Should there be a different provision on the working time organisation of health care staff with a view to safeguarding patient safety?

Please state your view:\*

[Only one answer possible]

	The current rules provide enough safety for patients
	The current rules should be maintained in substance, but clarified in light of the case law of the Court of Justice on on-call time and on timing of compensatory rest to improve legal certainty
	There should be additional derogations applicable to workers in the health care sector in order to improve continuity of service
✓	There should be a more narrow derogation applicable to workers in the health care sector in order to improve patient safety
	Other
	Do not know

500 character(s) maximum

IOSH believes healthcare workers must not be required to work where they are too tired to do so safely. Additional staff need to be made available to cover while rest is taken. Employers should have reasonable contingency arrangements in place for situations where provision of continuity of care is likely to be required. If this does not happen, it could mean that staff become tired, make mistakes and put health and safety at risk.

## 2.E Patterns of work

### Changes in working patterns

*The Working Time Directive was conceived more than 20 years ago, when information and communication technologies were not as developed and many types of present jobs did not exist yet. In light of these changes in working patterns and organisation, should the Working Time Directive introduce specific rules regulating particular situations and types of contracts such as telework, zero-hour contracts, flexitime, performance-based contracts without working time conditions, etc.?*

Please state your view:\*

[multiple answers possible]

<input checked="" type="checkbox"/>	The current rules are satisfactory and do not need to be changed
<input type="checkbox"/>	The rules should be changed in light of increasing telework
<input type="checkbox"/>	The rules should be changed in light of zero-hour contracts
<input type="checkbox"/>	The rules should be changed in light of increased use of flexitime
<input type="checkbox"/>	The rules should be changed in light of increased use of performance-based contracts without working time conditions
<input checked="" type="checkbox"/>	Other
<input type="checkbox"/>	Do not know

Please elaborate on your answer concerning telework:\*

500 character(s) maximum

IOSH believes that WTD applies to hours worked under telework arrangements, which should be counted and managed in a responsible way. We note that there can be blurring between home / work boundaries and also that in the UK, employees who work from home are significantly more likely to work long hours (Tipping *et al*, 2012). It is therefore important that out of sight does not mean out of mind and that employers monitor and manage the time that is worked and the workload and deadlines assigned. If research indicates this is not happening in practice, then further clarity in transposed regulations and guidance may be required.

Please elaborate on your answer concerning zero-hour contracts:\*

500 character(s) maximum

IOSH believes that WTD applies to hours worked under zero-hour contract arrangements, which should be counted and managed in a responsible way. If research indicates this is not happening in practice, then further clarity in transposed regulations and guidance may be required.

Please elaborate on your answer concerning flexitime:\*

500 character(s) maximum

IOSH believes that WTD applies to hours worked under flexi-time arrangements, which should be counted and managed in a responsible way. If research indicates this is not happening in practice, then further clarity in transposed regulations and guidance may be required.

Please elaborate on your answer concerning performance-based contracts:\*

500 character(s) maximum

IOSH believes that WTD applies to hours worked under performance-based contract arrangements, which should be counted and managed in a responsible way. If research indicates this is not happening in practice, then further clarity in transposed regulations and guidance may be required.

Please specify\*

500 character(s) maximum

IOSH believes that hours worked under any of these arrangements need to be responsibly managed. Some members have specifically raised concerns about 12-hour shifts. We recommend these should not be used in safety-critical or demanding jobs and their use should be generally minimised. Where they are used, more frequent rest / break periods should be given and the needs of vulnerable workers considered. We support HSE guidance (2006) that night-shifts or shifts where work is demanding, monotonous, dangerous and/or safety-critical, be limited to 8 hours. We also believe night-shift workers should be made aware of the health and safety risks and the availability of free health checks.

### Reconciliation of work and private life

*Do you think the Working Time Directive should support better reconciliation of work and private life by introducing any of the following specific rights:*

	Very undesirable	Undesirable	No preference	Desirable	Very desirable
The right for a worker to ask for specific working time arrangements (e.g. flexitime, telework) depending on their personal situation, and to have their request duly considered					✓
The right for a worker to request to take daily rest in blocks of time instead of uninterruptedly, allowing the worker for example to					✓

go home early in the afternoon and later continue work from home at night, and to have their request duly considered					
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If you would like to add comments or indicate another option:

500 character(s) maximum

IOSH believes that it can be beneficial for both workers and organisations if workers requests for specific working time arrangements are given due consideration by their employers.
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### 3. Looking ahead

#### Objectives for the future of the Working Time Directive

*For the future of the Working Time Directive, how important do you consider the following objectives?*

	Not at all important	Of little importance	Quite important	Very important	Do not know
While keeping the current Working Time Directive, to better ensure that Member States correctly and effectively put it into national law and practice				✓	
To improve legal clarity, so that the rights and obligations following from the Directive are clearer and more readable and accessible to all				✓	
To provide more flexibility in working time organisation for workers				✓	
To provide more flexibility in working time organisation for employers			✓		
To provide a higher level of protection to workers				✓	
To protect third parties involved (co-workers, passengers, patients, etc...)				✓	

## Approach for the future of the Working Time Directive

*Which of the following approaches for the future of the Working Time Directive do you prefer?\**

[only one answer possible]

	No new initiative (maintaining the current rules)
	No legislative changes but initiatives towards improved legal clarity so that the rights and obligations following from the Directive are clearer and more readable and accessible to all (interpretative communication; 'codification' of the case law (i.e. clearly stating the case law of the Court of Justice in the legal text)
	Legislative changes but focused on the sectors where there is a specific need in terms of continuity of service (e.g. public services; sectors that work on a '24/7' basis like hospital services and emergency services)
	Legislative changes which would lead to an overall revision of the Directive, containing a mix of simplification and additional derogations while avoiding regression of the protection of workers
✓	Other
	Do not know

Please specify:\*

300 character(s) maximum

IOSH believes it is important that the WTD is retained. We support improved legal clarity, so that rights and obligations are clearer, with interpretative communication and 'codification' of the case law. We also recommend a narrower derogation for healthcare workers with regard to postponement of rest periods. Additionally, we believe all working time should be monitored, including time worked under 'opt-outs', and that there shouldn't be pressure on workers to work long hours against their wishes.

Please motivate your answer:

500 character(s) maximum

[optional]

IOSH notes that in the UK, since 1998, there has been a decline in the incidence of long-hours working and that it is possible this is, at least in part, due to the 48-hour maximum (BIS, 2014). BIS analysis also suggests that the WTD has had little detectable impact on total hours worked in the UK economy, but a small positive impact on employment. Given the negative safety, health and social impacts associated with excessive working hours, we advocate better communication about the many benefits of well-designed working time arrangements and improved clarity about the requirements.

#### 4. Other comments or suggestions

*Do you have any other comment or suggestion on the review of the Working Time Directive that you would like to share?*

2,000 character(s) maximum

Optional. No hyperlinked or attached documents allowed.

##### **Summary IOSH position on working time**

- IOSH supports sensible working time management and effective worker protection.
- IOSH believes that any cost associated with sensible working time management will ultimately be more than offset by the many benefits (individual, business and societal) of better safety, health, productivity, reputation, resilience and results.
- IOSH recognises the positive benefits to health and wellbeing that rewarding employment can bring, but believe that working excessive working hours can adversely affect workers' health and wellbeing, safety and performance.
- IOSH believes that occupational safety and health practitioners can provide valuable advice to managers to help ensure that working time arrangements do not compromise the health and safety of workers and others.
- IOSH recommends that a code of practice would be more persuasive than guidance in helping ensure good health and safety practice from any employers who may not be inclined to otherwise adopt it.
- IOSH proposes that health assessment entitlement offered to night shift workers should also be offered to all those working consistently long hours, supported by adequate occupational health advice.
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- IOSH urges employers to make sure employees who choose to opt out of the 48 hour limit are aware that they can cancel their agreement at any time, but must give at least 7 days' notice (or longer if so agreed).
- IOSH emphasises that working hours should be monitored and properly managed, so that employers can help workers achieve a healthy work-life balance.
- IOSH advocates the benefits of flexible working arrangements, both for the employer and the employee, which can include arrangements such as remote working, flexi-time or job-sharing.

For more information about IOSH and our activities, please visit [www.iosh.co.uk](http://www.iosh.co.uk).

## References

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Department for Business Innovation and Skills (BIS), 2014. *Impact of working time regulations on UK labour market: A review of evidence* (BIS analysis paper No. 5), London: BIS.

European Commission (EC), 2010. *Detailed report on the implementation by Member States of Directive 2003/88/EC concerning certain aspects of the organisation of working time ('The Working Time Directive')*, SEC2010 1611 final, Brussels: European Commission.

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Tipping, S., Chanfreau, J., Perry, J. and Tait C, 2012. *The Fourth Work-Life Balance Employee Survey*. London: BIS.

## About IOSH

Founded in 1945, the Institution of Occupational Safety and Health (IOSH) is the largest body for health and safety professionals in the world, with around 44,000 members in over 100 countries, including over 13,000 Chartered Safety and Health Practitioners. Incorporated by Royal Charter, IOSH is a registered charity and an ILO international NGO. The IOSH vision is:

**“A world of work which is safe, healthy and sustainable”**

The Institution steers the profession, providing impartial, authoritative, free guidance. Regularly consulted by government and other bodies, IOSH is the founding member to UK, European and International professional body networks. IOSH has an active [research and development](#) fund and programme, helping develop the evidence-base for health and safety policy and practice. Summary and full reports are freely accessible from our website. IOSH publishes an international peer-reviewed journal of academic papers twice a year titled *Policy and practice in health and safety*. We have also developed a unique UK resource providing free access to a health and safety research database, as well other free on-line tools and guides, including websites for business start-ups and young people; an occupational health toolkit; and a risk management tool for small firms.

IOSH has 35 Branches in the UK and worldwide including the Caribbean, Hong Kong, Isle of Man, Oman, Qatar, the Republic of Ireland, Singapore and UAE, 16 special interest groups covering aviation and aerospace; communications and media; construction; consultancy; education; environment; fire risk management; food and drink; hazardous industries; healthcare; offshore; public services; railways; retail and distribution; rural industries; and sports grounds and events. IOSH members work at both strategic and operational levels across all employment sectors. IOSH accredited trainers deliver health and safety awareness training to all levels of the workforce from shop floor to managers and directors, through a professional training network of almost 1,700 organisations. We issue around 150,000 certificates per year.

For more about IOSH, our members and our work please visit our website at [www.iosh.co.uk](http://www.iosh.co.uk)

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