An Occupational Health and Safety Conversation: The Swedish and New Zealand Perspective

Ronny Tedestedt

Handledare: Lennart Wikander

Examinator: Gunilla Roos
CONTENTS PAGE

ACKNOWLEDGEMENTS ........................................................................................................................................ v
ABSTRACT .......................................................................................................................................................... vi
    Key Words: .................................................................................................................................................. vii
INTRODUCTION AND DISPOSITION .............................................................................................................. 1
1. BACKGROUND .................................................................................................................................................. 3
    Personal Links to Occupational Health and Safety .................................................................................. 4
    Sweden and New Zealand ......................................................................................................................... 4
SWEDEN ........................................................................................................................................................... 5
    Population ..................................................................................................................................................... 5
    Economy and Labour Market ...................................................................................................................... 6
NEW ZEALAND .................................................................................................................................................. 7
    Population ..................................................................................................................................................... 7
    Economy and Labour Market ...................................................................................................................... 8
Work-Related Harm Statistics: Sweden and New Zealand ........................................................................... 10
OHS: Current Issues in Sweden and New Zealand ....................................................................................... 10
Definitions of OHS: Sweden and New Zealand ............................................................................................ 12
Conclusion ......................................................................................................................................................... 14
2. AIM AND RESEARCH QUESTIONS ............................................................................................................. 15
    Research Aim .............................................................................................................................................. 15
    Research Questions ..................................................................................................................................... 15
    Glossary ....................................................................................................................................................... 16
3. METHODOLOGY .............................................................................................................................................. 17
    Introduction .................................................................................................................................................. 17
    Ontological and Epistemological Assumptions .......................................................................................... 17
    Qualitative Research Paradigm ................................................................................................................. 18
    Interpretive Research .................................................................................................................................. 19
<table>
<thead>
<tr>
<th>Section</th>
<th>Page</th>
</tr>
</thead>
<tbody>
<tr>
<td>Comparative Studies</td>
<td>20</td>
</tr>
<tr>
<td>Research Process</td>
<td>21</td>
</tr>
<tr>
<td>Sampling Decisions</td>
<td>21</td>
</tr>
<tr>
<td>Coding and Data Analysis</td>
<td>23</td>
</tr>
<tr>
<td>4. OCCUPATIONAL HEALTH AND SAFETY IN SWEDEN AND NEW ZEALAND: Literature Search</td>
<td>26</td>
</tr>
<tr>
<td>The Development of Occupational Health and Safety: An International Perspective</td>
<td>26</td>
</tr>
<tr>
<td>OHS Training</td>
<td>27</td>
</tr>
<tr>
<td>The Swedish Model</td>
<td>28</td>
</tr>
<tr>
<td>New Zealand OHS Legislation: Based on Robens’ Model</td>
<td>32</td>
</tr>
<tr>
<td>Worker Participation in Sweden and New Zealand</td>
<td>34</td>
</tr>
<tr>
<td>5. FINDINGS</td>
<td>37</td>
</tr>
<tr>
<td>Swedish Policy Documents</td>
<td>37</td>
</tr>
<tr>
<td>Work Environment and Regulation</td>
<td>37</td>
</tr>
<tr>
<td>Education for Elderly</td>
<td>41</td>
</tr>
<tr>
<td>OHS Training and Safety Representatives</td>
<td>42</td>
</tr>
<tr>
<td>Occupational Health and Safety Research</td>
<td>45</td>
</tr>
<tr>
<td>New Zealand Policy Documents</td>
<td>47</td>
</tr>
<tr>
<td>Culture</td>
<td>47</td>
</tr>
<tr>
<td>Regulation</td>
<td>49</td>
</tr>
<tr>
<td>Worker Participation</td>
<td>52</td>
</tr>
<tr>
<td>OHS Training</td>
<td>54</td>
</tr>
<tr>
<td>6. DISCUSSION</td>
<td>57</td>
</tr>
<tr>
<td>Introduction</td>
<td>57</td>
</tr>
<tr>
<td>Work Environment and Regulation</td>
<td>57</td>
</tr>
<tr>
<td>OHS Training and Attitudes</td>
<td>59</td>
</tr>
<tr>
<td>Worker Participation</td>
<td>61</td>
</tr>
<tr>
<td>OHS Research</td>
<td>62</td>
</tr>
<tr>
<td>Longer Working Life</td>
<td>64</td>
</tr>
</tbody>
</table>
7. FINAL CONCLUSIONS .................................................................................................................. 66

Conclusion One: OHS Regulation .................................................................................................. 66
Conclusion Two: Work Environment and OHS .............................................................................. 66
Conclusion Three: Inadequate Training for Safety Representatives ............................................. 66
Conclusion Four: Paid Leave for Training .................................................................................... 67
Conclusion Five: OHS Training ..................................................................................................... 67
Conclusion Six: Worker Participation ............................................................................................ 67
Conclusion Seven: OHS Research .................................................................................................. 67
Conclusion Eight: Changing Nature of Work ............................................................................... 67

Final Reflections .......................................................................................................................... 68

8. LIMITATIONS OF THIS STUDY ............................................................................................... 69

9. REFERENCE LIST ....................................................................................................................... 70
ACKNOWLEDGEMENTS

Firstly, I want to thank you Lennart Wikander for introducing me into comparative studies, a research field that is tricky but at the same time very interesting. Thank you for your insightful thoughts and after each meeting giving me some challenging questions for me to work on. Indeed, I have learnt not only about New Zealand but foremost much about Sweden during this semester of conducting this research project.

I also want to thank you Anu Salminoja for making me realise what a resource the staff at Blåsenhus Library, Uppsala University Library are. The service “Book a Librarian” should be a compulsory part of each students degree.

I am expressing my gratitude to you Kennet Tjärnström. You initiated me into the field of Occupational Health and Safety, by then something I knew very little about. The time at Iterab AB was a filled with plenty of learning opportunities, hard work around the County of Västerbotten, and great teamwork.

Felicity Lamm, I want to thank you for further developing my understanding and interest for Occupational Health and Safety in New Zealand. You manage to bring people with all sort of competencies from all around the world together to the Centre for Occupational Health and Safety Research, a place for ideas to develop and important research to be conducted. Thank you for your support and I am already looking forward to our next projects. We still have a lot to do.

I want to thank you Nadine McDonnell for your always thought provoking ideas. Your abilities of abstract thinking and seeing things from a different perspective has been important when conducting this research as well as trying to better grasp the idea of this world.

Pontus Jonsson, thank you for our great friendship and opening up your home for me. Without a place to stay I would not have been able to move to Uppsala with such short notice. Thank you also for listening to all my thoughts about this topic and all of our great conversations.

I also want to thank my parents, Renata and Robert for letting me do what I want. Mum, thank your for always answering my questions “But why?” as a child and developing my constant eager to learn. Dad, thank you for teaching me the foundations of dramaturgy. There always needs to be a story to tell.

There is one person I want to thank in particular, my wife and great partner in life Clare. Thank you for always being there for me, for listening to me and guiding me in my sometimes confused thoughts. Without you this research would never have been done. And I promise, I am coming home to New Zealand very soon.

Ronny Tedestedt, Uppsala January, 2014
ABSTRACT
There has been a change in the nature of work over recent decades with an increase in the use of non-standard forms of work. Non-standard work includes for example the use of contractors and sub-contractors. These forms of employment lead to a greater vulnerability of the workforce. These workers are missing out on union representation, training opportunities and basic employment protection. This directly impacts the safety of the workers due to the confusing legislation over duty of care. It is often unclear who is responsible for providing occupational health and safety (OHS) training for these workers. It is for this reason the following report will attempt to gain a better understanding of the policies and regulations surrounding OHS in two countries. Sweden and New Zealand have been chosen as a focus for this research because they represent two different governing systems.

The aim of this research was to describe what structures and policies regulate occupational health and safety matters in Sweden and New Zealand comparatively. It was also the aim of this research to seek insight into the policy conversation around OHS training in both Sweden and New Zealand. Three research questions have been used throughout the report to guide the researcher when selecting relevant documents collating the main themes and overall ensuring that the research stays on track. The questions are as follows:

- What structures and policies regulate occupational health and safety matters in Sweden and New Zealand?
-- What characterises both the Swedish and the New Zealand work environment?
--- What is the policy conversation around OHS training in Sweden and New Zealand?

The methodology chosen for this research was a qualitative approach because greater in-depth understanding for OHS matters were sought after. The research was focused around policy documents from both Sweden and New Zealand. The documents from each country were chosen because of their current and topical relevance to each country.

The main findings from this research were grouped into five themes based on key terms identified in both countries documents. The five themes are as follows:

• Work Environment and Regulation
• OHS Training and Attitudes
Conclusions were made based on these themes. OHS regulation was found to be adequate in Sweden in contrast to New Zealand. In New Zealand there is a call for major reforms to be made to the OHS legislation because due to its lack of adequate coverage for the current workforce. The term work environment is used in Sweden and includes a more holistic view, compared to the term occupational health and safety which is used in New Zealand and focuses more on safety and the prevention of work-related harm. Inadequate training for safety representatives were found to be an issue both in Sweden and New Zealand. In Sweden safety representatives are entitled to sufficient paid leave to fulfill their duties including training, in contrast to New Zealand where the safety representatives are entitled to only two days paid leave annually. OHS training was suggested to be a necessary component in many tertiary education programs both in Sweden and New Zealand. The suggestion was made to better prepare prospective managers who will have OHS responsibilities. Worker participation was found to be a necessary component of a well functioning OHS scheme in both the countries. It was not adequately regulated in New Zealand until the implementation of the Health and Safety in Employment Amendment Act 2002. In both Sweden and New Zealand new OHS research functions were suggested to be established. The changing nature of work is highlighted as a concern in both countries, because legislation does not adequately cover the new forms of work and is not conducive to OHS.

Key Words:
Occupational Health and Safety, Work Environment, Comparative Study, Sweden, New Zealand
INTRODUCTION AND DISPOSITION

There is a fast growing body of international research that has highlighted concern for the health and safety of workers in today’s labour market. The concern is primarily stemmed from a rapidly changing nature of work where many employers and larger organisations are outsourcing and casualising their workforces all in the name of profit. There has been a significant increase in the use of non-standard working arrangements such as the use of contractors and sub-contractors. The literature connects non-standard working arrangements with adverse occupational health and safety (OHS) risks and raises the concern for workers. Under such employment arrangements workers are often without Union representation, adequate training, and overall adequate regulatory protection. Complexity and confusion over employment status as well as duty of care responsibilities are new challenges for effective OHS performance in the changing nature of work. For this reason, the following report will attempt to gain a better understanding of the policies and regulations surrounding OHS in two countries. By analysing current policy documents from both Sweden and New Zealand it is the intention to gain greater insight into the OHS conversation from each country and ultimately conclude with a discussion comparing the two countries. OHS is of concern in both countries alike; both countries are facing similar changes to the nature of work. It is the hope that successes and failures can be compared and discussed to produce a final set of conclusions that can be used for further research.

The report begins with background study into relevant literature outlining the current nature of work in Sweden and New Zealand. This section is written to set a scene for the upcoming literature review and discussion and also to provide relevant information about each of the the two countries. The main points covered in the background section outline the OHS concerns for workers as it will explain the adverse affects of the changing nature of work. What follows is a brief summary of relevant background information and a snapshot of statistics from both Sweden and New Zealand. In this section the population figures are provided along with a short employment history for each country, unemployment figures, and the role the state and unions play in the labour market.

The research aim and research questions have been presented next to clearly outline the purpose of this report. There are two parts to the research aim that will be referred to throughout the report. In addition to this section, a glossary of relevant acroynmys and terms have been provided for purposes of clarity from the start.
On conclusion of the background the methodology section outlines the process for which the research of this report has been conducted. This section starts with a brief outline of some ontological and epistemological assumptions that are made by the researcher. Following on, the qualitative research paradigm including interpretative and comparative methods are presented. Finally the methodology section outlines the research process, step by step undertaken in this study.

Following on from the methodology section comes relevant literature outlining occupational health and safety in Sweden and New Zealand in its wider context. This section is written to present previous research and documents explaining which contextual components have shaped OHS structures and also what consequences these components have had in both Sweden and New Zealand. This section is also written to set a scene for the upcoming discussion and also to provide further relevant information about each of the two countries.

Next are the findings from the policy documents. The findings are structured around key themes extracted from the policy documents. The key themes that are used for the Swedish policy documents are: Work Environment and Regulation, Education for Elderly, OHS Training and Safety Representatives, Occupational Health and Safety Research. And the themes that are used for the New Zealand policy documents are: Culture, Regulation, Worker Participation, OHS Training. In this findings section there is no attempt to begin comparisons simply to present exactly what was found in both the Swedish and the New Zealand OHS policy documents.

This then leads to the discussion section where attempts have been made to compare and contrast the key findings from each respective country's OHS policy documents and previous research and other documents. The key themes from above have been used as reference points in order to structure the comparison.

Finally, simple conclusions will be given as a summary point for the report outlining the key contributions made from this analysis. Further research suggestions and limitations of the study have been briefly covered.
1. BACKGROUND

During the past two decades "the world of work has changed dramatically" (James, 2004, p. 1) as we see an increase of: small and medium-sized enterprises, a greater use of outsourcing and subcontracting and different forms of non-standard employment in the labour market. The degree to which Trade Unions are used and the negotiating power they once had has decreased in many developed countries. There has been a shift in employment trends with a growing service sector and major changes in how both public and private organisations are structured and managed. Due to low union representation and the changing nature of work, many academics have raised great concern that these changes have both contributed to and been followed by an increase of work-related harm (James, 2004). The greatest concern is that changes in regulations cannot be made fast enough to adequately protect workers in this rapidly changing labour market hence the study into occupational health and safety (OHS).

For a growing number of workers, the once assumed forms of labour security are now under threat (Standing, 2011). Changes in the labour market can be linked to different forms of labour insecurity as many industries attempt to casualise and outsource the workforce (Standing, 2011). As the nature of work changes so too does the ability for the law to protect workers. Complexity and confusion over employment status and duty of care responsibilities has meant that workers are often denied basic employment protection because the legal framework is limited in its protection in this seemingly unfamiliar territory (ILO, 2012). When there is a complex chain of responsibility and ever changing work sites workers miss out on training opportunities, union representation, basic leave protection, and other such employment rights (ILO, 2012). OHS training is a key component for a well functioning OHS scheme which can provide workers with knowledge about e.g. safe work practices and proper use of protective equipment, as well as knowledge about hazards and how to create a safe worksite (Robson et al., 2012). However as will be further explored in this research, there are stakeholders in the labour market who do not receive adequate OHS training they are entitled to (Independent Taskforce on Workplace Health and Safety, 2013; SOU 2013:25). Policy documents need to be continually reviewed and updated in order to maintain adequate protection of workers, especially in the area of OHS. Both the physical and psychosocial work environment have been a topic of debate and questions have been raised on how occupational risks can be best mitigated and regulated in a world characterised by non-standard working arrangements and ever-changing work environments (James, 2004).
Personal Links to Occupational Health and Safety

After graduating from Umeå School of Business at Umeå University in Sweden I began working at Iterab AB, a small HR consulting company specialising in training in occupational health and safety among other things. During my time working at Iterab as a consultant, trainer, and later manager I developed my understanding of the importance for adequate OHS and my knowledge about how these issues can be dealt with in organisations. I was often astonished by the poor OHS management within organisations. My passion for teaching and people made me realise how issues around this topic could be worked on and improved for a better working-life.

On moving to New Zealand I had the great pleasure to be involved within the Centre for Occupational Health and Safety Research (COHSR) at the Work Research Institute linked to Auckland University of Technology. Working on many and varied projects at COHSR gave me an insight to a different country’s way of organising and dealing with occupational health and safety issues. This gave me sufficient grounds to make basic comparisons between the two countries.

I soon realised that occupational health and safety issues in Sweden and New Zealand differ in terms of regulations, enforcement of and attitudes towards OHS. As I conduct this research project as a part of my Undergraduate Degree at Uppsala University in the field of Education I aim to gain a greater understanding for these two countries in terms of OHS and what shortcomings and also strengths can be learnt from two countries far apart geographically but still similar in many ways. It is my belief that there is a great need for understanding how occupational health and safety can be improved and through comparison I hope to accumulate an idea about best practice in for the current and future workforce.

As I learned at Iterab, training is one way we can influence the current and future workforce through both individuals and groups; a way that can be used for changing and questioning attitudes towards a specific question or topic. Therefore training in occupational health and safety is of great importance in order to create changes towards a safer and healthier work environment. As my time in both Sweden and New Zealand has taught me, it is important to understand the regulatory climate and the context of the country before attempting to train others and work for change. The following section will outline important information from both Sweden and New Zealand for this exact purpose.

Sweden and New Zealand

Anecdotaly Sweden and New Zealand are two countries similar in many ways. It has been said that the two countries look similar in landscape, are home to similar industries such as mining and forestry, and the people are similar in nature. However, the similarities stop there and one notable
difference is the variation in key OHS figures. In 2012, in Sweden the reported work-related fatality number was 45 (Arbetsmiljöverket, 2013a), similar to New Zealand where in 2012 there were 47 reported work-related fatalities (Ministry of Business, Innovation & Employment, 2013a). However, what is of concern and significant difference is the countries workforce statistics and make up. Sweden in 2012 had 4.6 million people employed (Statistiska Centralbyrån, 2013a) and in New Zealand there were 2.2 million employed (Statistics New Zealand, 2013a). By ratio, New Zealand had twice as many fatalities as Sweden in 2012, and this year is no exception from other years.

A wake up call for better OHS regulations and standards in New Zealand came in 2010 when a terrible mining disaster occurred on the West Coast of the South Island where 29 men lost their lives (Royal Commission on the Pike River Coal Mine Tragedy, 2012a). Many of the men who lost their lives were contractors and sub-contractors to the mine and no one person or entity was clearly responsible for the workers' health and safety due to confused duty of care regulations. Great scrutiny has been placed on the current New Zealand OHS regulations after this disaster and the Government has been called to take action (New Zealand Government, 2013).

Sweden, although has not recently faced such a disaster is not free from fault. There are still many issues related to OHS that are unclear and unresolved, particularly regarding sick leave (Frick, 2004). The issue of OHS is of particular relevance to me and is of equal concern, it is my intention to further discuss these and other related issues in following sections.

SWEDEN
This section will outline key information about Sweden in relation to population, labour market and economy. It is written to provide a basic understanding for what contextual components affect occupational health and safety matters in Sweden. Relevant statistics will also be presented to give context to the information.

Population
Sweden has a population of 9.6 million (Statistiska Centralbyrån, 2013b) and of these 4.7 million are employed. In September 2013 the unemployment rate was at 7.5 percent (Statistiska Centralbyrån, 2013c).

From being a traditionally homogenous country, since World War II Sweden has become a country that is home to many immigrants. During the 1950s and 1960s the immigrant workforce consisted of workers from Finland and south of Europe of which came to work in many of the growing factories. From the 1970s refugees from Latin America, the former Yugoslavia, the Middle
East and Africa came to Sweden (Frick, 2011). Sweden has gone from being a country where “employment was higher among people with a foreign background” (Abrahamsson, 2008, p. 5) based on a more labour-based immigration to today where a large proportion of immigrants are former refugees who struggle to get into the Swedish labour market (Abrahamsson, 2008).

Economy and Labour Market
It was not until the late nineteenth century when Sweden transformed from a poor agrarian country to a rich welfare state (Frick, 2011). In 2011 Sweden had a GDP per capita of 41,348 USD (OECD, 2013a). Unemployment was kept low and rarely went over 3 percent, between 1946 and 1991 and as a consequence of a growing export industry Sweden often faced labour shortage (Frick, 2011).

Traditional industries such as paper, engineering and steel manufacturing are still important but the number of employed in these sectors have reduced since the rationalisations from the 1970s. At about that time the public sector grew and employed about 30 percent of all employees, mainly women, but later shifted to the private sector which now employs around 45 percent of the workforce. In the early 1990s Sweden went through an economic crisis. This crisis led to public budget cuts, high unemployment rates but also an economic restructuring and rationalisation of the economy, and now the Swedish economy is highly globalised, where exports and imports are each about half of the GDP (Frick, 2011). The Swedish economy is nowadays, as Frick (2011) expresses: “very deregulated” (p. 117). After the economic crisis in the early 1990s the Swedish economy started to grow again and unemployment shrunk to around 4 percent in 2004. The recent economic crisis did hit Sweden by shrinking its exports and unemployment rose to above 7 percent (Frick, 2011).

The distribution of the employed across industries from 2011 is displayed in table 1 below.

<table>
<thead>
<tr>
<th>Type of Industry</th>
<th>Total Number Employed</th>
<th>Proportion of Total (%)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Agriculture, forestry and fishing</td>
<td>93 000</td>
<td>2.0</td>
</tr>
<tr>
<td>Manufacturing, mining, quarrying, electricity and water supply</td>
<td>612 000</td>
<td>13.1</td>
</tr>
<tr>
<td>Construction</td>
<td>312 000</td>
<td>6.7</td>
</tr>
<tr>
<td>Wholesale and retail trade</td>
<td>567 000</td>
<td>12.2</td>
</tr>
<tr>
<td>Transportation</td>
<td>238 000</td>
<td>5.1</td>
</tr>
<tr>
<td>Type of Industry</td>
<td>Total Number Employed</td>
<td>Proportion of Total (%)</td>
</tr>
<tr>
<td>---------------------------------------------------------</td>
<td>-----------------------</td>
<td>-------------------------</td>
</tr>
<tr>
<td>Accommodation and food services</td>
<td>144 000</td>
<td>3,1</td>
</tr>
<tr>
<td>Information and communication</td>
<td>196 000</td>
<td>4,2</td>
</tr>
<tr>
<td>Financial intermediation, business activities</td>
<td>737 000</td>
<td>15,8</td>
</tr>
<tr>
<td>Public administration, etc.</td>
<td>280 000</td>
<td>6,0</td>
</tr>
<tr>
<td>Education</td>
<td>504 000</td>
<td>10,8</td>
</tr>
<tr>
<td>Health and social work</td>
<td>723 000</td>
<td>15,5</td>
</tr>
<tr>
<td>Personal services and cultural activities</td>
<td>223 000</td>
<td>4,8</td>
</tr>
<tr>
<td>Unknown</td>
<td>13 000</td>
<td>0,2</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td><strong>4 642 000</strong></td>
<td><strong>100,0</strong></td>
</tr>
</tbody>
</table>


NEW ZEALAND
This section will outline key information about New Zealand in relation to population, labour market and economy. It is written to provide a basic understanding for what contextual components affect occupational health and safety matters in New Zealand. Relevant statistics will also be presented to give context to the information.

Population
New Zealand has 4,4 million inhabitants (Statistics New Zealand, 2013b) and of these 2,2 million are employed. As of September 2013 the unemployment rate was at 6,2 percent (Statistics New Zealand, 2013c).

New Zealand’s immigration before 1945 was based on a so called “White New Zealand Policy” (Robinson, Loughran & Tranter, 2000, p. 186). As a consequence of this restrictive policy 96 percent of non-Māori New Zealanders were of British origin until the Second World War. From the 1940s to the 1960s different immigration schemes were introduced in New Zealand in order to attract new settlers. However these schemes were still based on a so called White New Zealand
Policy. Similar to Sweden, New Zealand experienced labour shortages after the Second World War. In New Zealand this was met by both an increase of Māori workers that moved into the bigger cities but also by labour immigration from Pacific Islands, such as Tonga, Samoa, Fiji, Niue, the Cook and Tokelau Islands (Robinson, Loughran & Tranter, 2000).

In the late 1980s and early 1990s changes were made to immigration legislation and many immigrants from various countries in Asia moved to New Zealand. Arguments for changing the policy was to attract more foreign investment. However populist debates about immigrants from Asia led to a ‘hard-to-pass English language test’ in the late 1990s which reduced the number of immigrants from Asia. Instead more immigrants from the United Kingdom and South Africa came to New Zealand (Robinson, Loughran & Tranter, 2000). Today the New Zealand Government prides itself on independence from the UK as well as being a multicultural country: “... from being a British colony to an independent multicultural nation of the Pacific” (Statistics New Zealand, 2013d).

Economy and Labour Market

The ties between New Zealand and the UK are strong both in relation to immigration and the economy. New Zealand is not only a former British colony with traditions taken from the UK (Robinson, Loughran & Tranter, 2000) but it is also a good case study of introducing radical social, economic, and employment policies, explained by Lamm, Rasmussen and Anderson (2013) in following quote:

> For example, New Zealand was famed as the first country to give women the vote, as the birthplace of the welfare state, and for becoming a nuclear free country. In the late 1980s and through the 1990s it also became known for introducing pure neo-liberal economic theory in which the public sector bore the brunt. (p. 184).

In terms of main sources of income feeding the economy of New Zealand, for many years it was based around farming of wool and dairy products. These industries are still important, however tourism, film production and winemaking are continuously growing (Statistics New Zealand, 2013d). The five largest industries in regards to Gross Domestic Product (GDP) are in order as follows: 1) finance, insurance and business services; 2) personal and community services; 3) manufacturing; 4) transport and communication; 5) retail, accommodation, and restaurants (Statistics New Zealand, 2012). In 2011 New Zealand had a GDP per capita of 31 585 USD (OECD, 2013b) and the labour market consists of a large proportion of small enterprises, 97 percent of the businesses employ fewer than 20 people (Statistics New Zealand, 2011).
New Zealand’s economy is heavily dependent on export and trading with Australia, China, the United States, and Japan (Statistics New Zealand, 2012). The three main export commodities are in order as follows: 1) milk powder, butter, and cheese; 2) meat and edible offal; 3) logs, wood, and wood articles (Statistics New Zealand, 2013d).

The distribution of the employed across industries from 2012 is displayed in table 2 below.

<table>
<thead>
<tr>
<th>Type of Industry</th>
<th>Total Number Employed</th>
<th>Proportion of Total (%)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Agriculture, forestry, and fishing</td>
<td>150 600</td>
<td>6,8</td>
</tr>
<tr>
<td>Mining</td>
<td>7 000</td>
<td>0,3</td>
</tr>
<tr>
<td>Manufacturing</td>
<td>245 900</td>
<td>11,1</td>
</tr>
<tr>
<td>Electricity, gas, water, and waste services</td>
<td>17 500</td>
<td>0,8</td>
</tr>
<tr>
<td>Construction</td>
<td>170 900</td>
<td>7,7</td>
</tr>
<tr>
<td>Wholesale trade</td>
<td>96 500</td>
<td>4,4</td>
</tr>
<tr>
<td>Retail trade and accommodation</td>
<td>335 400</td>
<td>15,1</td>
</tr>
<tr>
<td>Transport, postal, and warehousing</td>
<td>106 100</td>
<td>4,8</td>
</tr>
<tr>
<td>Information media and telecommunications</td>
<td>43 400</td>
<td>2,0</td>
</tr>
<tr>
<td>Financial and insurance services</td>
<td>69 800</td>
<td>3,2</td>
</tr>
<tr>
<td>Rental, hiring, and real estate services</td>
<td>36 400</td>
<td>1,6</td>
</tr>
<tr>
<td>Professional, scientific, technical, administrative, and support services</td>
<td>249 500</td>
<td>11,3</td>
</tr>
<tr>
<td>Public administration and safety</td>
<td>121 000</td>
<td>5,5</td>
</tr>
<tr>
<td>Education and training</td>
<td>194 400</td>
<td>8,8</td>
</tr>
<tr>
<td>Health care and social assistance</td>
<td>231 300</td>
<td>10,4</td>
</tr>
<tr>
<td>Arts, recreation, and other services</td>
<td>133 100</td>
<td>6,0</td>
</tr>
<tr>
<td>Not specified</td>
<td>7 300</td>
<td>0,3</td>
</tr>
<tr>
<td><strong>Total all industries</strong></td>
<td><strong>2 216,1</strong></td>
<td><strong>100,0</strong></td>
</tr>
</tbody>
</table>
Work-Related Harm Statistics: Sweden and New Zealand

In New Zealand there are several high-hazard industries that account for the majority of both serious injuries and fatalities. These industries are manufacturing, construction, agriculture, forestry and fishing. These five industries account for more than half of all entitlement claims for work-related injuries and illness (Independent Taskforce, 2013).

According to the Independent Taskforce (2013) some population groups are more likely to be harmed at work and these groups are also over represented in the high-risk industries. The high-risk groups include: men, older workers, Māori, Pacific Islanders, workers of other ethnicities than European, self-employed, employees new to positions or engaged in temporary work. Some: “Anecdotal evidence suggests” (Independent Taskforce, 2013, p. 13) that workers with low literacy and numeracy skills are also at greater risk.

In Sweden there are also several high-hazard industries that account for the majority of injuries leading to fatalities. These industries are construction, agriculture, forestry, fishing, hunting, manufacturing and transport (Arbetsmiljöverket, 2013a).

OHS: Current Issues in Sweden and New Zealand

In this brief section some current OHS issues from both Sweden and New Zealand will be explored. In Sweden stress-related illnesses and high level levels of sickness benefits, as well as OHS matters in the staffing industry, are current topics. In New Zealand the overall OHS discussion arises from the coal mine disaster in Pike River and subsequent Inquiries, both the Royal Commission and the Independent Taskforce. Not the least politically OHS is a hot potato.

Andersson (2013) states that stress-related illness often is suggested to be one of Sweden’s great public health problems. Managers and safety representatives in Sweden report that stress and heavy workload are the most important OHS issues they are facing. The work environment components are in the Swedish Work Environment Act (Arbetsmiljölag 1977:1160) divided between physical and psychosocial categories. However both of these categories are stated in the Act to be equally important. The employer shall according to the act, chapter 3 and 2§: “... take all necessary steps to prevent the employee from being exposed to illness or accident” (Sveriges Riksdag, 2013).
In the mid 1990s about 5,000 people were hired by a staffing agency in Sweden. This number has increased to more than 60,000 in 2012. Not only that the staffing industry expands in number people employed but also in terms of more and more types of industries. Since staffing employees are found in numerous types of industries the occupational health and safety risks differs, although the staffing employees are found to be a target for higher work-related injuries. In 2011 all labour industries had an average of 6 per 1,000 work-related injuries in contrast to the staffing industry that had 12 per 1,000 injuries reported. The Swedish Work Environment Authority (SWEA) stresses the fact that a larger part of staffing employees are working in an office environment and not only typically high-hazardous industries. A greater number of young people are employed by the staffing industry, which means a greater number of young employees are being injured. Of those who are injured about 60 percent are under the age of 35 years in comparison to 30 percent for all labour industries (Arbetsmiljöverket, 2013b).

Characteristic for the Swedish staffing industry is that both the staffing company and the client company share the responsibility for the work environment and occupational health and safety. However, instead of ensuring a better working environment for the employee it risks to fall between two stools. More so the leased employees often changes between worksites and therefore might miss out on relevant information about how to carry out work in a safely manner (Arbetsmiljöverket, 2013b).

Occupational health and safety is a frequently discussed topic in New Zealand. A major mining disaster combined with general poor statistics of OHS in New Zealand has not surprisingly led to a greater interest, especially in the political debate, over this matter.

On the 19th of November 2010 there was an explosion at the Pike River Coal Mine and 29 men died (Royal Commission on the Pike River Coal Mine Tragedy [Royal Commission], 2012a). Royal Commissions are reserved for matters of significant public interest and on the 29th of November 2010 the Prime Minister of New Zealand announced that a Royal Commission inquiry was to take place looking specifically into the Pike River disaster (New Zealand Government, 2010). The Royal Commissions mission was to: “Establish what happened at the Pike River Mine and why” and ”Identify what can be done to avoid future tragedies” (Royal Commission, 2012b)

In June of 2012 the Independent Taksforce on Workplace Health and Safety was established by the Minister of Labour. The mission for the Independent Taskforce was to research and evaluate critically the workplace Health and Safety system in New Zealand. The research and critical evaluation would be the basis for recommendations of practical strategies in order to reduce
the high rate of workplace fatalities and serious injuries by 2020 (Independent Taskforce on Workplace Health and Safety [Independent Taskforce], 2013)

On the 1st of July 2012 Department of Labour was merged into a so-called ‘Super Ministry’ called The Ministry of Business, Innovation and Employment (MoBIE) together with Department of Building and Housing, Ministry of Economic Development, and Ministry of Science and Innovation (Ministry of Business, Innovation and Employment, 2013).

On the 5th of November 2012 the Royal Commission released their report on Pike River and on the same day Hon Kate Wilkonson resigned as Labour Minister (New Zealand Government, 2012).

On the 30th of April 2013 the Independent Taskforce on Workplace Health and Safety delivered its report to Hon Simon Bridges, Minister of Labour, and among many recommendations is a stand-alone health and safety regulator (Independent Taskforce, 2013c).

On the 16th of December 2013 a new stand-alone Crown Agency called WorkSafe New Zealand was established and began operation (Ministry of Business, Innovation and Employment, 2013c) based on recommendations from both the Royal Commission (2012a) and the Independent Taskforce (2013).

Definitions of OHS: Sweden and New Zealand

This research is a comparative study about occupational health and safety matters in Sweden and New Zealand. This brief section will be used to clarify the terms used in regards to occupational health and safety and work environment, two frequently used terms, in both Sweden and New Zealand.

Occupational health and safety (OHS) is a multidisciplinary subject (Independent Taskforce, 2013) and there are many, partially competing, definitions on occupational health and safety (Hörte, 2009a). One way to define OHS is to follow definitions from legislation, regulation and agreements. Another way is to consider how practitioners use the terms, and a third way of looking at it is to turn into research and academic literature. Only then can we gain a full understanding.

In Sweden the term ‘arbetsmiljö’ is frequently used among all three mentioned areas above and literally translates into ‘work environment’. Another word is added to the term, which is ‘säkerhet’ or ‘safety’ and together the term in Swedish is ‘arbetsmiljö och säkerhet’. Since the Swedish term includes ‘arbete’, or ‘work’, the origins and use of the terms ‘work’ and ‘labour’ could be of relevance to define (Hörte, 2009a). However this interesting discussion will not be
further examined in this limited report due to time and space limitations. The word environment can be defined as the surroundings and can be used to describe the interaction between surroundings and humans, animals or plants. Work environment was firstly used to describe situations where humans and machinery met. The mechanisation of work has led to a less need for muscle force in many industries. However new issues related to work environment has risen, e.g. repetitive operations. Work environment nowadays is not only physical components but also psychosocial matters, where the perceived environment is included (Hörte, 2009a).

What is included in the phrase work environment has changed over time and some definitions of it are very broad, or holistic. Although Hörte (2009a) suggests that is important he also raises a note of caution; the term work environment should not be over used, trying to cover everything, then it could loose its meaning. Work environment is now also related to a broader term ‘arbetsliv’ or ‘working life’.

In the Swedish Work Environment Act (Arbetsmiljöläg 1977:1160) chapter 2 it is stated that the work environment shall be satisfactory with respect to the nature of work and the social and technological development of society. The working conditions shall be adjusted to individuals different conditions, both physically - such as ventilation, lighting, vibrations - as well as mentally so workers are not exposed to physical or mental strains that could cause illness or accidents. The organisation of work is also mentioned in the Act and it shall be formed with consideration to the worker and aim at enabling social contact, co-operation and a stimulating working life. The worker shall be given opportunity to play an active role in the formation of his or her working situation. Wages and working time shall also be considered in the organisation of work. The Act also suggests that opportunities should be available for personal as well as professional development where the worker plays an active role. Freedom under responsibility should be sought after (Sveriges Riksdag, 2013).

In the New Zealand Health and Safety in Employment Act 1992 the work environment is defined, under part 2, chapter 6. It is stated that employers shall ensure safety of employees by inter alia provide and maintain a safe working environment with respect to exposure to different types of hazards and emergency situations (New Zealand Parliamentary Counsel Office, 2013a).

Hörte (2009a) argues that the English use of work environment often misses the system level of the term, like it is frequently used in the Swedish ‘arbetsmiljö’. The term work environment is often found in Swedish and other Scandinavian research and could perhaps be a consequence of that is has been directly translated to English (Hörte, 2009a).
The term occupational health and safety, often shortened to OHS, is a common term around the world; within the European Union, as well as other recognised international organisations also outside of the EU. The definitions of OHS that Hörte (2009a) mentions are all focused on the individual and their health and wellbeing. The system level is absent in the use of OHS and therefore it is not seen in relation to an organisation’s overall performance, e.g. in terms of productivity and profitability. Therefore Hörte (2009a) suggests that the English terms ‘human factors’ and ‘ergonomics’ are most of an equivalent to the Swedish term ‘arbetsmiljö’.

However in this report the term occupational health and safety (OHS) is used in order to create consistency, if not otherwise stated where the researcher felt it necessary to specify something broader and therefore has used the term work environment.

**Conclusion**

In conclusion, this brief review of both Sweden and New Zealand has presented some background information about population, economy and other labour market characteristics that in the past has had, and still have an impact on the overall conditions in regards to OHS. Although the statistics vary in terms of what is included under one specific type of industry, some similarities between Sweden and New Zealand can be noted where e.g. manufacturing, health care and retail are three main types of industries that employ the majority of the workers. Other similarities are that both Sweden and New Zealand experienced labour shortages after the Second World War, and in both countries this was to some extent met by immigrants from different countries. Differences between the two countries can also be noted, where New Zealand by ratio had twice as many work-related fatalities as Sweden in 2012. The focus for OHS also varies between the two countries, due to the context and current topics in each respective country, where in Sweden focus is more on high levels of sick leave and psychosocial matters, in contrast to New Zealand where much of the current OHS debate links to the disaster at the Pike River Coal Mine. Also different terminology and definitions of work environment and OHS are being used in Sweden and New Zealand comparatively. Both these countries are facing like many other countries, a changing nature of work, which has implications for how OHS issues are and will be dealt with. In this global changing nature of work education and training are tools that can be used, both to increase knowledge of OHS but also as a influence process (Lingard & Yesilyurt, 2003). This leads us to the aim and research questions for this study.
2. AIM AND RESEARCH QUESTIONS

Research Aim
The following section outlines the aim for the research that is to follow. The aim was written taking into consideration the background information above and the researcher's intention to make findings based on a comparison between the Swedish and New Zealand relevant policy documents as well as other documents. The selection process will be further outlined in the methodology section.

- The first aim of this research is to describe the structures and policies that regulate occupational health and safety matters in Sweden and New Zealand comparatively.

-- The second aim of this research is to seek insight into the policy conversation around OHS training in both Sweden and New Zealand.

Research Questions
These research questions have been used throughout the report to guide the researcher when selecting the relevant documents collating the main themes and overall ensuring that the research stays on track.

- What structures and policies regulate occupational health and safety matters in Sweden and New Zealand?

-- What characterises both the Swedish and the New Zealand work environment?

--- What is the policy conversation around OHS training in Sweden and New Zealand?
**Glossary**

Below are some acronyms and their definitions used in this research.

ABF = Workers’ Educational Association  
Arbetarskyddsnämnden = Joint Industrial Council  
Arbetsförmedlingen = Swedish Public Employment Service  
Arbetsmiljöverket = Swedish Work Environment Authority  
BAM, Bättre arbetsmiljö = Better Work Environment  
CSN = National Board of Student Aid  
DoL = Department of Labour  
Independent Taskforce = Independent Taskforce on Workplace Health and Safety  
KF = Swedish Co-operative Union  
LO = Swedish Trade Union Confederation  
MoBIE = Ministry of Business, Innovation & Employment  
NOHSAC = National Occupational Health and Safety Advisory Committee  
OHS = Occupational Health and Safety  
SAF = Swedish Employers’ Confederation  
Vuxenutbildningen (sometimes referred to as Komvux) = Municipal Adult Education, Special Training for Adults, and Education in Swedish for Immigrants.
3. METHODOLOGY

Introduction
The aim of this research is to better understand the structures and policies that regulate OHS matters in Sweden and New Zealand comparatively. Furthermore, to seek insight into the current policy conversation around OHS training in both Sweden and New Zealand by finding, reading and analysing policy documents as well as other documents such as previous research. Through this process it is hoped that the researcher will gain a better understanding for these two countries in terms of OHS and what shortcomings and also strengths can be learnt. It is the researchers belief that there is a great need for further understanding about how OHS can be improved and through a comparison of these two countries it is the hope of the researcher to accumulate an idea about best practice for the current and future workforce in each country. Below is an outline covering and arguing for the choices made by the researcher including why qualitative research was chosen, why interpretivist research was then selected, and how the researcher used comparative literature to inform the methodology for this research. However first some ontological and epistemological assumptions made by the researcher are presented below.

Ontological and Epistemological Assumptions
Research about occupational health and safety is being conducted across many academic disciplines in which there are different traditions in terms of research designs. Among the scientific disciplines it is common to conduct studies by undertaking experiments whereas the social sciences observations and interviews are more common. The decision about research design and methodology are based in what ontological and epistemological assumption the researcher him or herself possess and/or the traditions within the discipline (Hörte & Christmansson, 2009). The researcher has certain perceptions about how the reality we are living in is constructed. This perception is of importance; depending on how the researcher perceives the reality assumptions about how knowledge is constructed will be made (Hörte, 2009b).

Questions about ontology are concerned with the nature of being and what is of existence. One important question is whether social entities can or should be seen as objective components or if they should be seen as constructions based on the participants perceptions and actions. The former one can be described as objectivism and the latter as constructionism (Bryman, 2011). Questions about epistemology are concerned with what knowledge is and how it can be created. An important question to raise here is whether the social reality should or can be examined through the
same principles as science. Those researchers who claim that principles and methods can be applied to the social sciences could be categorised within inter alia namely positivism. The opposite to positivism, although this might be an over-simplification, is called interpretivism. Within the field of interpretivism there are, as within the positivism, many sub-traditions. Many interpretivistic ideas are based around understanding and interpretations, such as hermeneutics which is linked to Weber’s concept of *Verstehen* (German for understanding) (Bryman, 2011).

Hörte (2009b) raises a noteworthy point, that in some academic disciplines there seems to be no ontological and epistemological discussion. This does not mean that these perspectives are not present, but the opposite. However one important reason for such instances can be that there is nothing challenging the current paradigm. In a discipline where the majority of scholars agree on assumptions about what the reality consists of and how knowledge can be created, there might not be a need to discuss these matters.

The research conducted in this report is based on a qualitative approach, which arises from an assumption that reality is something constructed by participants and their actions. One of the research aims for this study is to seek insight, which is closely associated with understanding. A qualitative approach is best suited for conducting this research due to the researcher’s desire to gain a greater understanding for both the Swedish and the New Zealand OHS structures and insight into policy conversation around OHS training. As will be further discussed below, the researcher has choosen an interpretative approach to analyse structures and conversations around OHS matters and OHS training.

**Qualitative Research Paradigm**

A qualitative approach is best suited for conducting this research due to the researcher’s desire to gain an overall understanding for both the Swedish and the New Zealand OHS structures and insight into policy conversation around OHS training. What qualitative research is or is not is however not always easy to define (Bryman & Burgess, 1999 cited in Bryman, 2011). Qualitative research covers a wide and sometimes conflicting collection of activities (Silverman, 2006). The most apparent distinction between qualitative and quantitative research is that the qualitative usually is collected and focused on words, whereas quantitative research is focused on figures. However another three distinctive traits for qualitative data can be observed: 1) an inductive perception between theory and practice where theory is derived from research results; 2) an epistemological standpoint which can be described as interpretive and where focus is on understanding the social reality; and 3) an ontological standpoint based on constructivism, where
social attributes is a result of interaction between individuals and not a phenomena separated from 
those who are a part of it and constructing the phenomena (Bryman, 2011). Qualitative 
investigations tend to focus more on in depth on a selected few cases (Patton, 2002).

The distinction between qualitative and quantitative research methods has been a topic of 
great debate within academia. Qualitative research has often been termed as unscientific, entirely 
personal and filled with bias. However qualitative researchers defend themselves and argue they are 
able to get closer to what is being studied and examine the reality (Denzin & Lincoln, 1998). The 
choice of methodology, qualitative or quantitative, should be based on what will best answer the 
research question so neither should be viewed as right or wrong, simply which is the best fit to 
uncover the desired outcome (Hjerm & Lindgren, 2010). For this research a qualitative approach 
has been adopted due to its aim to seek insight and greater understanding for OHS matters and OHS 
training. One way of conducting qualitative research is with use of interpretive research which is 
briefly outlined below.

**Interpretive Research**

This research aims to describe and understand structures and policies regarding OHS and OHS 
training and therefore the researcher’s pre-existing knowledge about OHS is acknowledged to 
influence the interpretations. Many fields in research are adopting an interpretive style of research 
since individuals can never be separated from their surroundings, cultural background, and a set of 
beliefs. These beliefs not only influence the researcher but also the researched phenomena (Denzin 

The researcher’s own beliefs are to a certain degree based on what Sandberg (2013) writes, 
namely:

... a long Swedish and Scandinavian experience of and belief in welfare, qualifications, dialogue, equality, 
autonomy and democracy at work, both as goals in themselves and as means to economic development.  
(p. 9)

Consequently there is no one interpretive truth, however unlike other methodologies the interpretive 
research allows the researcher to take into consideration the context, environment, and relational 
aspects of the studied phenomena. In a sense qualitative research is creative, where the researcher 
does not simply collect and present findings in logical lists but instead by interpretations presents 
his or her constructions (Denzin & Lincoln, 1998).
Comparative Studies

When conducting a comparative study the researcher uses more or less identical methods in the study of two cases. Through comparison the researcher aims to gain a greater understanding for two or more different phenomena (Bryman, 2011). Hantaris (1996, cited in Bryman, 2011) gives a definition of cross-cultural studies in the following quote:

... individuals or groups that will study specific issues or phenomena expressed in different socio-cultural environments (institutions, manners, traditions, values, lifestyles, languages, thought patterns) with use of the same research tools with aim to either conduct a secondary analysis of national data or to collect new empirical data. The objective may be to explain similarities and differences or to gain an increased awareness about and a deeper understanding for the social reality that the national contexts represents. (p. 80)

The contextual factors that needs to be taken into account when conducting a comparative study is also discussed by Teichler (1996) in the following quote:

Due to the complexity of the different national settings, comparative research is bound to take into account a wealth of variables which cannot be as strictly controlled as a perfect research designs calls for. (p. 462)

Cross-cultural studies are not without hassles, especially when conducting a secondary analysis of data it is of importance to find matching data in both the cases. Language barriers are to be managed, as well as specific national or cultural contexts to be dealt with carefully. As well as there are obstacles to overcome, cross-cultural studies may increase the understanding for research within the social sciences that often are culture bound (Bryman, 2011).

Comparative studies are often exploratory. In terms of development of research methodology, comparative studies are important because they often provide unexpected insight and often call for new concepts (Teichler, 1996). Critics of comparative studies suggest that these types of studies mislead the researcher by focusing too much on how best to compare the two cases at the expense of the specific context. As a consequence the researcher may already in the beginning of the study be forced to choose a narrow focus for the study, instead of allowing a more wide approach especially in the beginning of the study (Bryman, 2011). This issue can be dealt with by basing a comparative study on a semi-structured research design, where the researcher is allowing new ideas in during the research process (Teichler, 1996).
Comparative studies can also play an important role in understanding an increasingly globalised world (Jarvis, 2000). As Jarvis (2000) expresses it: “... by comparing and understanding difference, both in institutions and culture ... greater levels of tolerance might be developed” (p. 354).

**Research Process**

**Sampling Decisions**

Qualitative sampling methods allow the researcher to collect data in context and also gather in-depth information (Miles & Huberman, 1994). For this reason only a small sample of cases are chosen (Miles & Huberman, 1994). Qualitative samples tend to be purposeful rather than random, because social processes tend to have a logic and understanding that random sampling may miss (Miles & Huberman, 1994).

The sampling methods chosen for this research are consistent with the above suggestions. A small number of policy documents have been chosen. The policy documents have been chosen through an ongoing process. This has meant that the number of policy documents have increased during the time of the research process. Much effort has been put to find comparable policy documents, in order to find matching data in both Sweden and New Zealand. It is the researcher’s assessment that the Independent Taskforce’s report from New Zealand is most comparable to the Swedish Public Inquiries (Swedish: Statens offentliga utredningar), and not other policy documents from Sweden such as Governments Bills (Swedish: propositioner). The chosen policy documents from both Sweden and New Zealand are on a national level. Although these policy documents are comparable, it has been noted by the researcher that the inquiry and consultation processes differ somewhat. It has also been noted by the researcher a shift in how the Swedish Public Inquiries are being conducted nowadays compared to earlier decades, where in the past the inquiries often were characterised by a detailed and thorough consultation process, similar to the process undertaken by the Independent Taskforce in New Zealand, to nowadays being characterised by fewer expert statements and overall a shorter consultation process.

In order to avoid a narrow focus for the study a more wide approach to the research was adopted in the beginning. As the research process proceeded, the aim was narrowed down to better meet the specific requirements for a research project on an undergraduate level.

The policy documents from New Zealand consist of the report by the Independent Taskforce on Workplace Health and Safety as well as the Royal Commission on the Pike River Coal Mine Tragedy as well as other relevant policy documents. The Independent Taskforce’s report and
recommendations are of significant importance politically but also in terms of a policy document for further debate and research. The Independent Taskforce’s report forms the basis for the New Zealand Government’s response, Working Safer: A Blueprint for Health and Safety at Work (New Zealand Government, 2013). The report from the Independent Taskforce is a thorough and comprehensive review of the overall OHS system in New Zealand and has already become a key policy document in regards to occupational health and safety matters in New Zealand. In the foreword to Working Safer: A Blueprint for Health and Safety at Work (New Zealand Government, 2013) the Minister of Labour, Hon Simon Bridges, expresses the importance for this response as well as stressing the importance of both the recommendations made by the Independent Taskforce as well as the Royal Commission:

The report of the Royal Commission on the Pike River Coal Mine Tragedy was a serious wake-up call for us all. ... In 2012 the Government established the Independent Taskforce on Workplace Health and Safety (the Taskforce) to advise on possible ways to meet our goal of reducing the rate of fatalities and serious injuries in the workplace by at least 25 per cent by 2020. The Government has carefully considered the recommendations of the Taskforce and our response – Working Safer – outlines the programme of change necessary to improve health and safety at work. Working Safer represents the most significant reform of New Zealand’s workplace health and safety system in 20 years. (p. 3)

The Swedish policy documents consist of a number of Public Inquiries (SOU, Statens offentliga utredningar) and some directives (Dir.) from the Swedish Government. These policy documents covers most of the current OHS policy discussions in Sweden. Most Inquiries have been sampled from the Swedish Government’s website, and then limited by Inquiries conducted on behalf of the Ministry of Employment (Arbetsmarknadsdepartementet) with one exception where an Inquiry is conducted on behalf of the Ministry of Health and Social Affairs (Socialdepartementet). The documents that have been chosen are listed below categorised by country. The literature and other documents for this research have been selected to provide a context and enable a greater understanding for the findings from the policy documents.

Swedish Policy Documents:
New Zealand Policy Documents:


Coding and Data Analysis

According to Bryman (2011) the most appropriate way to analyse the data from the policy documents was to use an open coding system with thematic analysis. An open coding system can be defined as: “... a process based on breaking down, examining, comparing, conceptualising and categorising data” (Bryman, 2011, p. 514). The method for this type of analysis is broken down into stages that allow the researcher to reduce large amounts of information into themes, and later analyse the themes and the connections between them. As a result of this method the researcher can interpret the data to show significant findings.

Reading through the data at an early stage of the research process and to read it at least twice is the best practice method suggested by Bryman (2011) and are deemed to be important actions in order not to drown in the data and to get an initial understanding for the data. When reading through the data for the second time notes can be taken and the coding can begin. Once the initial coding is done many codes are likely to arise, however Bryman (2011) suggests that some of the codes can be modified at a later stage, once the researcher has examined the codes. The researcher should thereafter search for connections between the codes and try to put some of the codes together, into a higher level of abstraction. The researcher should also search for connections between the codes and the literature or the theoretical framework for the research. The coding itself should not be equated with the analysis, which is a later stage of the research process. One way to organise and put codes together is by copy and paste codes into a Word document. Each code should have a reference, in order for the researcher to be able to easily go back to the source.

One issue, as well as a common criticism, regarding coding is that there is a risk for the context to get lost when the data is broken down and categorised, which Bryman (2011) expresses in the following quote:
A very common criticism of the coding procedure, for the qualitative data analysis, is the potential problem that the context is lost in what is said. (p. 526)

In order not to loose the context for OHS matters in Sweden and New Zealand this research also presents a review of some of the relevant research that has been done in the field in each respective country. Also a brief review of each country's legislation has been done in order to provide the context for which these policy documents have arisen from. Contextual factors such as legislation, culture, attitudes and origins of labour market systems all play an important role for how OHS matters are dealt with. These contextual factors are also important when conducting a comparative study. The aim of this research is both to describe OHS structures as well as seek insight into policy conversation around OHS training, and therefore the importance of contextual factors can not be stressed enough. This review of the literature and legislation follows next after the methodology section.

By referring to findings from the review of both legislation and relevant research some unspoken content (Boréus & Bergström, 2005), underlying ideas, attitudes and reasons for e.g. political changes affecting OHS matters can be identified. The policy documents do also represent underlying values, however in this research the focus at the policy documents are more on the manifest or obvious (Boréus & Bergström, 2005) content.

The method that has been chosen to analyse this data follows very closely the suggestions made by Bryman (2011) in his steps for coding and emerging themes out of the data. Below is a detailed outline of the steps taken to reach conclusions from this specific data.

1. The data was read through without predetermined ideas and then read through again to get a more clear idea about the content. Before this the researcher had participated in some discussions as a part of the public consultation process during the Independent Taskforce’s inquiry and had a basic understanding for the intensions of this inquiry. The researcher had also taken note of what the Royal Commission’s mission was, by attending academic seminars and also followed the media debate about this matter. In terms of the Swedish policy documents the researcher had no clear ideas about the Inquiry 2013:25 and had not heard or taken note of the other policy documents.

2. During the second read through initial codes were allocated to the text of the policy documents. The codes were created in a Word document and followed the order of each policy document. Each policy document was coded individually. In regards to the Independent Taskforce’s report more codes were given due to the nature of this document. Some of the Swedish policy
documents contains other matters not related to OHS and therefore some sections were not being coded. This decision was made by the researcher.

3. On the third read through of the policy document text similar codes from each policy document were put together under main themes, country by country. Some of the codes did not fit exactly under the key themes so new themes were created.

4. Once key themes had been established from all the policy documents they were placed in order based on links between the themes and the relevant literature. This made it easier to see connections between the findings and the literature. By putting them into wider themes it was easier to reduce a large number of themes, and making it easier for the analysis.

5. In the discussion similarities and differences between the Swedish and the New Zealand policy documents were analysed as well as relating it to the literature review. Some of the themes from each country represented were put together into a new theme in the discussion, e.g. ‘OHS Training and Safety Representatives’ (Sweden) was used in two themes in the discussion; both under ‘Workers Participation’ and ‘OHS Training and Attitudes’.
4. OCCUPATIONAL HEALTH AND SAFETY IN SWEDEN AND NEW ZEALAND: Literature Search

This chapter will begin with a broad international perspective of OHS in order to put both the Swedish and the New Zealand information in context. This is a part of the analysis process whereby the researcher has analysed relevant literature and legislation to place the policy documents in context.

The Development of Occupational Health and Safety: An International Perspective

The international development of occupational health and safety (OHS) can be categorised into three levels or waves of OHS reforms and policies. The first wave emerged in the 19th century in the early industrial society where working conditions were harsh. This wave continued until the 1960s and the focus of OHS policy changed somewhat during the decades but was still focused on the large problem of occupational accidents and on workers’ behaviour towards risks. The second wave of OHS can be dated to the 1970s and early 1980s in many Western Countries when psychosocial matters and work organisation became a part of the OHS definition. In this second wave of OHS focus turned towards preventive actions and protect workers from exposure to risks. The third wave started in the 1980s and can still be seen in progress. In the third wave mandatory OHS Management (OHSM) reflects a shift from specific regulatory on what the employers’ responsibilities are, towards how they should manage the implementation of current laws (Thörnquist, 2008). It can be noted that both in Sweden and New Zealand the current OHS systems are primarily based on this third wave of OHS, in New Zealand based on Robens’ model (Lamm, Rasmussen & Anderson, 2013) and in Sweden with a systematic work environment management approach, in Sweden referred to as SAM (Systematiskt arbetsmiljöarbete) (Frick, Eriksson & Westerholm, 2005).

The third wave of OHS can also been described as a more self-regulatory system, with the aim to achieve broad OHS goals (Gunningham & Johnstone, 2000) and as Lamm, Rasmussen and Anderson (2013) expresses it: “... driven in part by a desire to manage OHS in a more holistic and systematic way across organisations” (p. 194). According to Gunningham and Johnstone (2000) the law:

... has the potential instead, to stimulate modes of self-organisation within firms in such a way as to make them self-reflective and to encourage internal self-critical reflection about their OHS performance. (p. 126)

in this third wave of OHS.
The advantage of detailed regulations with specific standards on exactly “how to control hazards ... is that duty holders know exactly what to do, and OHS inspectorates find them easy to enforce” according to Gunningham and Johnstone (2000, p. 127). The authors continue by arguing that the weakness of this approach is that it often leads to an unmanageable mass of rules which are hard to keep up to date and are “often difficult to understand” (p. 127) and also this strategy does not encourage new ways of managing OHS matters. Instead of detailed regulations a growing trend is towards general duties, which include performance standards, process requirements and documentation requirements (Gunningham & Johnstone, 2000). Although OHS can make interpreting and managing OHS more easy through fewer specific regulations the main criticism is that it requires a high level of expertise and especially commitment from management in order to be successful (Lamm, Rasmussen & Anderson, 2013).

**OHS Training**

Training in occupational health and safety is a cornerstone for a well functioning OHS scheme. As this section briefly will outline, OHS training can be used as a tool to influence individuals’ behaviour. Although this section begins with some noteworthy thoughts around learning, training, and education in general.

As Lauder, Brown, Dillabough and Halsey (2006) expresses it:

> We live in an age when there is great optimism about the power of education to influence the well-being of individuals and nations. (p. 1)

Training and education is closely linked to learning. Learning can be seen as one of the humans most important activities in order to adjust to changes as well as being part of creating changes. The importance of learning and why many organisations emphasises learning is because it is one of the most effective tools to both meet and create changes at the worksite. The importance of learning and knowledge is also frequently seen in relation to increased profit, where training might have a positive outcome on the productivity (Mattsson, 1995). Petersson (2006) states that for an increased number of organisations focused efforts on training and development have become a strategic matter. The types of training vary in content, organisation and form depending on the objectives and desired outcomes for the training (Petersson, 2006).
One type of training is in the field of OHS. Training in OHS aims to promote the learning of certain OHS competencies. Although forms of OHS training may vary, it most commonly consists of:

... hazard recognition and control, safe work practices, proper use of personal protective equipment, and emergency procedures and preventive actions. (Robson et al., 2012, p. 193)

OHS training can also include a component on how to enable both workers and managers to make appropriate changes in the workplace environment to increase worksite protection and safety (Robson et al., 2012). OHS training is also an important way of informing workers about their rights (Miara, Gallagher, Bush & Dewey, 2003).

The difference between training and education is a question where there is disagreement. However the most relevant distinction is that training needs to include some practical, or hands-on, element (Robson et al., 2012).

OHS training is a commonly used tool with aim to ease poor OHS records, such as workplace harm including injuries, illnesses and fatalities. The tool is used because it can positively affect workers practices (Robson et al., 2012). Since unsafe behaviour became recognised as a factor related to workplace accidents, effort has been put to the behavioral aspects of OHS. Safety related behaviour is suggested to be influenced by both extrinsic factors but more so the individuals' beliefs and attitudes. One way to explain workers safety behaviour is to consider their, whatever they might be, beliefs about their work environment (Lingard & Yesilyurt, 2003).

Lingard and Yesilyurt (2003) show in their study that workers’ perception about OHS before training activities were in some cases based on a fatalistic view, that their own: “... experience of occupational injury or illness was related more to luck or chance than their own behavior” (p. 63). Beliefs such as mentioned are more likely to discourage workers from working safe. However after the workers had undertaken training a behavioural change could be observed, which also led to behavioural change in the workers actions (Lingard & Yesilyurt, 2003). Also Wilhelmson (2004) stresses how training can change people's attitudes and behaviour.

The Swedish Model
In employment relations the Swedish Model is a term used to describe how the Swedish labour market has been organised. It is of relevance for this research because health and safety in the workplace is also governed by this model.
A key element to the Swedish Model are the Trade Unions. From the 1980s to the mid 1990s the level of unionisation grew in a few OECD countries, with Sweden being one of them (Walters & Frick, 2000). The peak of unionisation was in 1993 with 83 percent membership. The unions in Sweden became powerful and created a tradition of interaction between unions and employers at both local and central levels (Frick, 2011). However the level of unionisation thereafter decreased and was less than 70 percent in 2010 (Kjellberg, 2010 cited in Frick, 2011).

One of the main roles of the unions is to sign collective agreement with employers and these agreements cover working conditions that in many other European countries are regulated by public labour law (Frick, 2011). For example there is no national minimum wage in Sweden, instead minimum wage differs depending on industry and is regulated in the different collective agreements (Swedish Work Environment Authority, 2013).

The Swedish Model has developed through a long historical process and one important milestone was the December Compromise in 1906 which was concluded between LO (Swedish Trade Union Confederation) and SAF (Swedish Employers’ Confederation) (Thörnquist, 2008). In this agreement SAF and the employers accepted and recognised the unrestricted employee right to organise, while LO and union members accepted the right of employers to hire and fire and to manage and organise work (Eurofound, 2009). However the Swedish model generally refers to the “system of conflict resolution and cooperation in the labour market” (Thörnquist, 2008, p. 44) that was defined, and later developed, in the main agreement between LO and SAF in Saltsjöbaden in 1938 (Thörnquist, 2008). The agreement from Saltsjöbaden radically changed the employment relations climate in Sweden, which before 1938 had been conflict-oriented where strikes and mistrust between unions and employers were common features. This agreement also became a framework for a system with central agreements between LO and SAF (Zellman & Kemp, 2004). Thörnquist (2008) summarises the overall aim of the central agreements in the following quote:

The overall aim of this centralized model, including also tripartite cooperation between the state and the labour market parties, was to promote economic growth and full employment in combination with stable prices, industrial peace, work safety and a universal welfare policy based on the idea of ‘fairer’ distribution of income between different groups in society. (p. 43)

The idea of centralised bipartite and tripartite cooperation remained in Sweden until the 1980s when SAF began to leave this model, and moved as society, in an international neo-liberal trend. In the early 1990s SAF totally withdrew from this system (Thörnquist, 2008). What must be noted is that the Swedish state had a more withdrawn role in the system based on central agreements. Instead the
system was based on power balance between the labour parties (Zellman & Kemp, 2004), a significant difference to many other countries where the state would intervene (Nycander, 2002). The Swedish model was a system that acknowledged the fundamental opposition between labour and capital (Thörnquist).

The main role of the state was to attain a stable welfare policy, without too much involvement in industrial relations. Although labour market parties were represented on a governmental level through agency boards and commissions. Therefore labour market parties had ties to the Social Democratic government that was in office from 1932 until 1976 (Thörnquist, 2008). Although the central agreements were established at confederate level, the agreements were settled also at the sector/industry level and the workplace level, hence the term ‘centralized self-regulation’ (Thörnquist, 2008).

Training in OSH on a wider scale, or mass training as Thörnquist (2008) describes it, was developed and launched after the Second World War by the Joint Industrial Council (Arbetarskyddsämnden). This Council launched training campaigns in the 1950s with titles as ‘Safety Pays’ (Arbetarskydd lönar sig) and ‘Why does it happen?’ (Varför händer det?). These training campaigns were carried out with ABF (Workers’ Educational Association) and Brevskolan, a company for correspondence courses owned by the Swedish Co-operative Union (KF), LO and the Workers’ Educational Association (ABF). The purpose of these mass training campaigns were to increase the knowledge among people involved in local OHS enforcement, such as safety representatives and supervisors. The way these training courses were carried out was through a use of the Study Circle method, in Sweden a frequently used non-hierarchical form of voluntary adult education (Thörnquist, 2008).

In the 1970s a new course and campaign was launched, called Better Work Environment (Bättre arbetsmiljö, BAM) in which the changed perspective of OHS was reflected; from a focus on creating safe workers towards safe workplaces. The Work Environment Fund together with the adult educational associations in Sweden enabled the course Better Work Environment (BAM) to become one of the largest public movements ever seen. Since the 1970s more than one million safety delegates, supervisors and others have completed BAM (Thörnquist, 2008).

In the 1970s Sweden implemented a new Act, the Work Environment Act (Arbetsmiljölag 1977:1160) which is a frame act (ramlag). The Swedish Parliament has given the Government and the Swedish Work Environment Authority (Arbetsmiljöverket) the right to specify and clarify the frame act in regulations, called Arbetsmiljöverkets författningssamling (AFS) (Andersson, 2013).
As mentioned previously, the central agreements were withdrawn in the 1990s when SAF left this system. This also meant a dissolution of the central agreements on OHS training. In 1995 the Work Environment Fund was closed down and a substantial part of the financial basis for mass training disappeared. The course BAM is still given and is still a central part of the OHS training in Sweden. However, as the third so-called wave of OHS hit Sweden focus has been on management and leadership in relation to OHS, and therefore the course content often is adjusted to fit intermediate level managers or industry specific interests. BAM is now commonly provided internally in companies, as well as by unions in cooperation with ABF (Thörnquist, 2008).

“What then is left of the classical Swedish model?” Thörnquist (2008, p. 56) asks. Above all over 90 percent of workers are still covered by collective agreements and the Swedish trade union system is still based on a combination of centralisation and decentralisation. The unions administrate unemployment benefits which are financed by “government subsidies (90%) and by member fees (10%)” (Thörnquist, 2008, p. 56) which could explain why union density in Sweden is still very high (Thörnquist, 2008).

Sandberg and Movitz (2013) also ask what is left of the Swedish model and concludes that while there may be disagreement on whether anything or what is left of the Swedish model:

... there seems to be far more agreement, at least in the public debate, that Sweden is undergoing a major change. (p. 13)

Sandberg (2013) stresses what the changes in the Swedish welfare state during the last two terms with a centre-right government with tax cuts for people that are being employed has lead to, in the following quote:

... slashing of benefits for the sick and unemployed, lower benefits and hikes in fees for unemployment insurance, less restrictions on unsecure and short-term jobs. (p. 10)

And in relevance for OHS research is the closure of the National Institute for Working Life (Arbetslivsinstitutet) another change (Frick, 2009; Sandberg, 2013; Thörnquist, 2008). The centre-right government also “abolished subsidies for health and safety education and information” (Frick, 2009, pp. 163-164) as well as reduced the support and funding for other actors involved with OHS, such as the Swedish Work Environment Authority (Frick, 2009).
New Zealand OHS Legislation: Based on Robens’ Model

The ties between New Zealand and UK can be observed in the legislative ties to the UK. Much of OHS legislation in New Zealand was derived from British labour law. At first the main focus was around regulating working conditions for women and children, which is exemplified in the Employment of Females Act 1873. However the poor working conditions during the late nineteenth century and many fatal work injuries in both factories and mines led to further regulation not only concerning women and children. A fatal boiler explosion in the goldfields resulted in the Inspection of Machinery Act in 1874. The Factories Act was passed in New Zealand in 1891, based on the Australian equivalent from 1885, which was derived from the British Factory and Workshop Act from 1878 (Lamm, 1994).

The New Zealand Factories Act 1891 was providing protection for workers, but as Lamm (1994) expresses the most significant aspect of the Act was: “... that inspectors were to administer them, creating for the first time a potentially effective enforcement mechanism” (p. 59). The Factories Act 1891 also formed a framework for subsequent legislation (Lamm, 1994).

In 1897 the Workmen’s Compensation Act was passed in the UK, where employers were made liable to pay compensation for injured workers. This UK compensation system was based on a no-fault basis, where the injured worker would receive compensation regardless of fault. New Zealand followed the British model of workers compensation and legislation was introduced in 1900, although legal interpretation of the act continued for many years (Lamm, 1994). This compensation system lasted until 1974 in New Zealand (ACC, 2013) and was followed by another no-fault compensation system based on the Accident Compensation Act, a result after the Royal Commission of Inquiry into Compensation for Personal Injury in New Zealand, also known as the Woodhouse Report (Lamm, 1994). The Woodhouse report envisaged a new way or organising and funding a no-fault compensation system, which Lamm, McDonnell and St. John (2012) summarise by saying:

A Royal Commission in 1967, chaired by Sir Owen Woodhouse, envisaged a social contract in which New Zealanders surrendered the right to sue for personal injury but received more certain, equitable and adequate compensation, rehabilitation and medical care, whether the injury occurred at work or at home and whether or not the fault could be established. (p. 21)

By the 1970s the OHS legislation in New Zealand had become: “… piecemeal, complex and unwieldy” (Lamm, 1994, p. 59). Lamm (1994; 2010) gives several reasons for this. Firstly, the legislation had been implemented in an ad hoc manner. Secondly, the legislation was very
prescriptive and specific about certain hazards and workplaces. Thirdly, the OHS legislation was covered in an enormous amount of regulations, e.g. by 1980 OHS legislation was found in more than thirty acts and supported by about hundred regulations administered by five government departments. Fourthly, some sectors of the labour market were not covered by legislation, e.g. hospitals and universities. Lastly, workers were given no statutory powers for participation around OHS issues.

In the 1970s other countries also reformed their OHS legislation (Lamm, 1994) and in 1970 the Committee on Safety and Health at Work, chaired by Lord Robens, was appointed by the British Government (Robens, 1972) and presented recommendations based on their inquiry (hereafter referred to as the Robens’ report or Robens’ model). The Robens’ report (Robens, 1972) had the following terms of reference: “To review the provision made for the safety and health of persons in the course of their employment” (p. XIV) and to consider whether any changes were needed in: “... the scope or nature of the major relevant enactments, or the nature and extent of voluntary action concerned with these matters” (p. XIV). One key factor was identified by the Robens’ report: apathy (Lamm, 1994) and the fundamental conclusion, in order to promote better OHS was according to Robens (1972): “... a more effectively self-regulating system” (p. 12).

The Robens’ report came to play an important role not only in the UK but also in New Zealand with regards to OHS legislation. Two main themes from the Robens’ report were seen as important by the New Zealand Government. One theme was a single act covering all workers and the second theme was a self-regulatory approach were no longer only the state but also employers and employees plays had the duty of care for workers (Lamm, 1994).

Instead of detailed regulation the recommendations from Robens’ report were that there should be a:

... general act embodying the common law principle of ‘duty of care’. That is, there is a duty on the employer, as far as is reasonably practicable, to identify problems specific to work-sites and devise to appropriate solutions. (Lamm, 1994, p. 60)

When the Robens’ model was implemented in the New Zealand OHS system it was a lighter version. One key component that was not implemented was supportive legislation for workers’ participation. Failure to reduce the level of injuries, illness and fatalities was by some blamed on the Robens’ model (Lamm, 2010). However Lamm (2010) critiques this and suggests that the failure to improve New Zealand’s OHS record should be seen in relation to the unsupportive legislation, which is expressed in the following quote:
Specifically, the 1992 Act did not incorporate formalised, joint participation mechanisms nor did it cover all workers. Indeed, New Zealand was the only country that adopted the Robens’ model without the joint participation component. The fact that the legislation did not formalise worker participation was not surprising given the National government’s preference for employment relations policies that favoured individualism and self-interest. (p. 171)

Worker Participation in Sweden and New Zealand

Worker participation is as Harris (2011) expresses it is:

... a cornerstone of systematic occupational health and safety management (OHSM), which has become the dominant legislative strategy for improving workplace health and safety across industrialised nations. (p. 45)

In Sweden worker participation is regulated by the Work Environment Act (Arbetsmiljölag 1977:1160) chapter 6. At a worksite where at least five workers are employed regularly a Safety Representative, or Work Environment Representative, shall be appointed. In most cases the trade union will appoint safety representatives. At a worksite were at least fifty workers are employed regularly a Safety Committee (Skyddskommitté) shall be appointed with representatives of both the employer and employees (Sveriges Riksdag, 2013). There are no statistics on the number of safety representatives in Sweden since 2006 when the Swedish Work Environment Authority (Arbetsmiljöverket) stopped to register newly appointed safety representatives (Lundgren, 2012). In 2005 Frick, Eriksson and Westerholm (2005) reported there were more than 100,000 safety representatives, but it is suggested that the number has dropped to about 96,000 more recently (Lundgren, 2012). At workplaces without safety representatives and/or safety committees most are supported by regional safety representatives (Frick, Eriksson & Westerholm, 2005). The regional safety representatives are outsiders but still have the same rights and duties as local safety representatives, and can therefore be seen as an anomaly within the normal industrial relations system (Frick, 2009).

In New Zealand worker participation is regulated in the Health and Safety in Employment Amendment Act, 2002. In part 2A, 19A-19H, employee participation is defined and clarified (New Zealand Parliamentary Counsel Office, 2013b). This Act gives, as Harris (2011) expresses it, the workers: “... the right to ‘have a say’ in the running of their organisations, and has significant potential for improving the working environment and making working life more democratic” (p.
This Amendment Act gives the representatives rights to access information about OHS systems and issues, make recommendations about OHS matters to the employer, and two days paid leave annually to attend OHS training (Harris, 2011). When the principal OHS statute, Health and Safety in Employment Act 1992 was implemented it did not cover worker participation. It was not until the Health and Safety in Employment Amendment Act 2002 was implemented that workers had an:

... enforceable right to participate in OHS beyond the traditional domain of collective bargaining, with the HS representative promoted as the primary mechanism for workers to channel their views. (Harris, 2011, p. 46)

The lack of adequate worker participation in New Zealand, before the Amendment Act 2002, was also noted by Frick and Wren (2000). Although the Amendment Act 2002 was passed, in some cases workers still may not be represented. In the Amendment Act 2002, part 2A, 19C, first paragraph the employer is obliged to establish an employee participation system only if the: “... employer employs - a) fewer than 30 employees ... and 1 or more of the employees, or a union representing them, requires the development of a system for employee participation; or b) 30 or more employees, whether or not at a single location” (New Zealand Parliamentary Counsel Office, 2013b). However there has been a rise in the number of health and safety committees and worker representatives in New Zealand over the past decade (Lamm, 2010). The underlying reasons for this are a more supportive legislation but also productivity motifs in a global and more competitive business environment. Worker participation and effective use of health and safety committees can be seen as a response to reduce costs associated with occupational injuries and illnesses and an increase of productivity (Lamm, 2010).

Walters and Frick (2000) argue for a close relationship between worker participation and Systematic Occupational Health and Safety (OHSM). Workers participation serves a double purpose; to support managers to pursue set goals, and to protect workers interests. Sometimes the interests of managers and workers may be the same, but in some cases they may vary. Managing OHS matters within an organisation with participation from the workers gives the potential to monitor OHSM in a more effective way rather than relying on inspection from regulatory agencies, however it cannot replace the inspections due to lack of enforcement authority. The level of effectiveness of workers participation is dependent on how the workers: “... directly or as representatives” (Walters & Frick, 2000, p. 57) can articulate their views on OHS to the management. In order to stand up for views against management employment security is crucial (Walters & Frick, 2000).
Employment security however is under threat with the changing nature of work. Some of the changes having an impact on OHSM are related to, but not only: job insecurity and unemployment which contributes to feelings of insecurity and therefore an uneasiness among workers to participate in representation; fragmentation and downsizing larger organisations into smaller ones which threatens collective bargaining; increased use of non-standard types of employment, e.g. self-employment, casual, short-term contract and agency workers which makes unionisation more challenging; more smaller enterprises for which legislation based on larger organisations does not correspond; and changes in both trade unions power to negotiate central collective agreements to more local agreements as a consequence to more employers new HR strategies (Walters & Frick, 2000). As a consequence of the changing nature of work union rights have come under attack (Adler, 2013).
5. FINDINGS

Swedish Policy Documents
Below are the findings from the policy documents selected from Sweden. Many points were raised, in the documents; the main themes have been selected and presented specifically relating to the aim and research questions of this report. As a result of the text analysis conducted the following themes were identified and are presented as follows: Work Environment and Regulation, Education for Elderly, OHS Training and Safety Representatives, Occupational Health and Safety Research. The themes form the structure of the findings section below.

Some direct quotes have been used to give the reader a better understanding for what opinions are directly expressed in the policy documents. To enable a better understanding for the quotes who do not understand Swedish, the quotes have been translated by the researcher of this study.

Work Environment and Regulation
The Inquiry (Statens offentliga utredningar 2013:25) [SOU 2013:25] begins with an description of national regulations concerning OHS. The Work Environment Act (Arbetsmiljöläg 1977:1160) is explained, in the quote below:

The Work Environment Act ... regulates the obligations of employers and other duty holders with OHS responsibility about prevention of work-related illnesses and accidents. There are also regulations about co-operation between employers and employees, for example regulations about the safety representatives function. The Work Environment Act provides the framework for the environment at work. The Swedish Work Environment Authority has by the Government been given the assignment to issue regulations on requirements for the work environment in, in their statutes (AFS). (p. 105)

The statutes issued by the Swedish Work Environment Authority regulates numerous components of the work environment and occupational health and safety, such as use of machinery and tools, ergonomics, construction sites, noise as well as mental and social aspects of the work environment. The statutes are developed in consultation with parties involved at the labour market (SOU 2013:25, pp. 105-106).

The role of the Swedish Work Environment Authority is also described by the Inquiry. The Authority shall exert, supervise and inspect work sites, in order to strengthen the OHS conditions on
work sites. An important part of the supervision carried out by the Authority is to increase the abilities among employers to prevent hazards. During the inspections the employer also will be notified about issues that need to be addressed. The selection of work sites for inspections is based on both how serious hazards are in the industry but also that the inspections are considered to make a positive change to the work site. Statistical variables on e.g. reported injuries, fatalities and sick leave rates are also considered by the Authority before an inspection is carried out (SOU 2013:25, p. 106).

The employers’ responsibility for occupational health and safety is also defined by the Inquiry (SOU 2013:25), which following quote states:

It is the employer's responsibility to ensure that work can be done without risks of illnesses or accidents. It is also the employer's responsibility to systematically plan, lead and control the worksite and ensure that operations are conducted in such a way that illnesses and accidents are prevented and that the work environment is satisfactory. (p. 106)

The safety representatives’ role and authority is also clarified by the Inquiry (SOU 2013:25) which states that:

The safety representative represents the workers in OHS matters and the Work Environment Act provides them with the authority to for instance to call off dangerous work. (p. 106)

The definition of work environment in the Swedish legislation is broad and includes many aspects of work (SOU 2013:25) which following quote shows:

The work environment covers all factors and conditions in relation to work, including technological, physical, organisational and social matters. Also the content of work is included in the work environment. (p. 106)

Although the regulation might seem clear and comprehensive, the changes in the labour market and the changing nature of work put increased pressure and new demands on OHS matters being properly implemented and enforced, which the Inquiry (SOU 2013:25) describes as follows:

Today's labor market is increasingly moving towards a working life characterised by rapid changes and uncertainty. The number of precarious jobs are increasing, workers are to a greater extent tied loosely to employers and workplaces. The proportion of permanent employment decreases. The use of contractors and agency workers increases ... This places great demand on adaptation of the OHS policy tools so that
they are fit for its purpose also with new conditions in the labour market. How the development of the labour market affects the work environment and occupational injuries should be very closely monitored. The development gives cause for concern ... (p. 152)

The content and character of work has in many industries changed from physically demanding and with low requirements of higher education. With the changing nature and new sectors emerging, OHS hazards has also changed, which the Inquiry (SOU 2013:25) states in following quote:

As late as during the 1950s and 1960s the work-life was dominated by physically demanding jobs that required only lower levels of education. The physical work environment was often dangerous and multiple workers were injured or killed at work. Other workers became worn out prematurely. The differences compared to today's conditions are great. Today, machines and technology have increasingly taken over the heavy and dangerous tasks. These structural changes mean that more people are working in the service sector. Most jobs today also require education. The occupational health and safety has improved in many professions and industries in an almost dramatic way. (p. 129)

Another side of the development of improved physical components of OHS in many professions and sectors is that new issues are noted, especially concerns in the psychosocial work, which the Inquiry (SOU 2013:25) expresses as following:

Partly new work environment problems grew in magnitude, such as stress and psychosocial pressure, as a consequence of inter alia a gap between demand and control at work. More workers also take work home and find it difficult to relax. (p. 151)

Knowledge and understanding about the long-term risks with a heavy psychosocial work-load is still limited, which the Inquiry (SOU 2013:25) suggests is because it often takes long time before a permanent reduced capacity for work can be observed (p. 151) as a consequence of psychosocial strains. In saying that occupational health and safety has improved in many professions, the Inquiry (SOU 2013:25) also emphasises that still predominantly among female-dominated professions and sectors a significant proportion of workers indicates shortcomings of OHS (p. 148). It is relatively more common that females are under psychosocial pressure and stress, both in female-dominated sectors such as Councils and Counties but also in the private sector (p. 151).

The character of the work environment has primarily to do with what type of occupation and production the workers are a part of and operates within. However the Inquiry (SOU 2013:25) believes that working life is a particularly difficult domain to regulate, which is expressed in the following quote:
The working life does not allow itself to be governed politically in nearly the same extent as e.g. care or education. Expectations for quick, politically driven improvements in the working environment have often been unrealistically big. The challenge is to still maintain an aggressive and sustained health and safety policy. (p. 153)

Although the Inquiry (SOU 2013:25) finds working life difficult to regulate, it does not suggest to change the current way of regulating it but suggests more funding for an increase of activities that are already being carried out to some extent, which following quote supports by saying:

The current focus of managing occupational health and safety the Inquiry assess mostly as appropriate and functional. The Inquiry considers that enhanced occupational health and safety efforts should be based on the preventive work that is being carried out by inter alia employers, the Swedish Work Environment Authority and the safety representatives. Investments into health and safety training is also needed at universities and for safety representatives. (p. 153)

Not only the content and character of work has changed, but also the demographics of the Swedish population. More and more people are living longer. Although this means that the current retirement system demands the employed to support an increasing group of individuals who are both living longer and also demands a greater need for care (SOU 2013:25, p. 124). Although individuals are living longer, when taking into consideration entry and exit age Sweden has compared to other European countries an average length of work-life (p. 126). Older individuals are nowadays healthier and more highly educated. Although attitudes and regulations allowing older people to continue their work-life, after the average retirement age of 65 years, has not followed the trend of healthier people (p. 128). The Inquiry (SOU 2013:25) takes therefore a focus at the relationship between older workers and work environment. Although the focus of the Inquiry is on older workers, also younger workers are of interest, since preventive actions may counteract to later illnesses and injuries (p. 149). The relationship between socio-economic groups and average life expectancy has been a subject for many studies (p. 137) and the Inquiry is making the assumption that OHS factors can also be related to average life expectancy, which is shown in the following quote:

However, there is reason to assume that the difference in life expectancy between different socio-economic groups to some extent may be related with OHS deficiencies. The factors that contribute to excess mortality at work are much more common in occupations with lower educational requirements and lower wages. (p. 137)
The Inquiry (SOU 2013:25) stresses the importance of adequate occupational health and safety, both for those who after a long working life might be worn-out and might be in need of rehabilitation, but also in terms of preventive tools such as training and development. Actions contributing to a longer working life and a higher retirement age can only be successfully implemented in combination with preventive and systematic efforts to reduce ill health. The preventive approach obtain a greater importance in the Inquiry which states following:

Long-term efforts to enable more people to work a full work-life are needed. ... Efforts are needed for better working conditions, including through systematic occupational health and safety, investment in skills development through training and increased efforts to find a new job rather than a permanent exit from the labour market. (p. 140)

The employers as stated by the Inquiry (SOU 2013:25) play an important role of providing competence development and training as well as for the occupational health and safety for their employees, which following quote expresses:

The employers play a key role by taking responsibility for recruitment, occupational health and safety, competence development and training, restructurings, terminations etc. (p. 148)

The employers, in co-operation with the unions, are already required by the Work Environment Act (Arbetsmiljölag 1977:1160) to adjust the work environment to fit each individual workers circumstance, which is expressed in following quote:

The requirement for adjusting the work environment to the individuals’ circumstances are defined in the Work Environment Act. That this is actually implemented at the workplace is primarily the employer's responsibility. Also the workers' labour unions play an important role. (SOU 2013:25, p. 152)

Lack of training and competence development, within the profession or re-training to a new profession, as well as adjustment of the work environment is based on each individual’s needs which leads to the next theme, Education for Elderly.

Education for Elderly
As stated by the Inquiry (SOU 2013:25) the adult education (Vuxenutbildningen) in Sweden, on both pre-secondary and secondary level, has foremost focused on individuals that have a lower
education background, as well as providing education for individuals who have previously chosen the wrong education pathway a second chance (p. 158). The admission criteria do not restrict older individuals to this form of education. However few older people take advantage of this training opportunity. An obstacle for older people to study is, according to the Inquiry (SOU 2013:25) the income loss felt when studying. The Swedish financial aid system, the National Board of Student Aid (CSN), has set upper age limits; from the age of 45 years the possibility to take a loan is restricted and from the age of 54 years the study allowance is not given (p. 160).

Most university education programs and also vocational training courses are available to older individuals in Sweden, although they are mainly adjusted to fit younger individuals. The Inquiry (SOU 2013:25) does not suggest major changes of education range, with one exception which is stated in the following quote:

The Inquiry nevertheless considers that the current range of education in general should be able to cater to the demand of the elderly. It can reasonably be expected that educational providers will gradually adjust their offerings to an expected increase of demand among elderly. However special efforts in one area might be needed, and that is in regard to occasional vocational courses for older individuals that are in need of upgrading their competence. (p. 161)

Not only adult education (Vuxenutbildningen) and tertiary education but also training provided by the Swedish Public Employment Service (Arbetsförmedlingen) is discussed by the Inquiry (SOU 2013:25). There are no formal upper age limits for this type of training. However the aim for training provided by the Swedish Public Employment Service is for the individual to return to work, which leads to following:

The employment training aims for 70 percent of the participants to get a job after completing the training which means priority will not be given to older individuals who have difficulties to find a job. (p. 162)

OHS Training and Safety Representatives
The next key theme identified in the Swedish policy documents is OHS training in a wider sense, as well as OHS training for safety representatives. In order for the safety representatives to fulfill their obligations good OHS knowledge is pointed out by the Inquiry (2013:25) to be of importance. Good understanding and knowledge for OHS comes from OHS training. However firstly the role and importance of the safety representatives will be outlined.
The safety representatives play a key role in the enforcement of health and safety in workplaces and ensure a good OHS status in workplaces. The Inquiry (SOU 2013:25) describes the importance of the safety representatives as follows:

The Inquiry states that the safety representatives hold an important role for a well functioning occupational health and safety scheme. Knowledge about risks, hazards, preventive actions, regulations and so on is crucial for the work carried out by safety representatives. (p. 215)

The safety representatives in Sweden possess a unique position (SOU 2013:25, p. 214) since the Work Environment Act (Arbetsmiljölag 1977:1160) states that co-operation between employers and safety representatives shall be conducted. Also worker participation is a key component of occupational health and safety, which the Inquiry (SOU 2013:25) expresses as following:

The Work Environment Act states that the employer and employees shall co-operate in the issues regarding occupational health and safety. Even if the employer has the ultimate responsibility for occupational health and safety, it is an explicit requirement that the organised work with occupational health and safety is to be conducted together with the employees and their representatives. The safety representative is the employees representative. (p. 214)

The safety representatives are, by the Work Environment Act, entitled to a series of rights, such as taking notes of documents regarding OHS circumstances, taking an active part in planning and implementation of changes that affect working conditions, stopping work in case danger of life, and also getting the necessary training. In terms of training the Inquiry (SOU 2013:25) declares following:

Safety representatives are entitled to training and leave to such extent that is required for the duty of the representatives role with maintained salary. The safety representatives training is providied by for example unions, but also the non-profit organisation Prevent, owned by the stakeholders of the labour market, and also by the privately owned company Arbetsmiljöforum AB. (p. 214)

The changes in the Swedish labour market has however changed the conditions for many safety representatives, including a lack of health and safety training, which the Inquiry (SOU 2013:25) put in this way:
Several studies show that many safety representatives do not obtain required training in order to pursue their duty. Decreasing unionisation and involvement among the members weakens the safety representatives function in the work environment work. (p. 214)

Due to the changes in the labour market and a lack of health and safety training among safety representatives the Inquiry (SOU 2013:25) considered some form of state intervention, e.g. control of the safety representatives through certification. However, the Inquiry has not found it possible to submit such recommendations in the report. The Inquiry does suggest a mobilisation of health and safety training for safety representatives with a focus on musculoskeletal injuries, since this is the most common occupational illness leading to sick leave (p. 215).

The Inquiry (SOU 2013:25) emphasises the importance of health and safety training, not only for safety representatives but also in higher education. The insufficient knowledge about occupational health and safety among participants in the labour market is described as follows:

In today’s labour market it is insufficient that a few experts in occupational health and safety possess good knowledge in occupational health and safety, when OHS shall be integrated in all work activities. These skills are needed among many more. All managers and supervisors need to have good knowledge about inter alia how to manage occupational health and safety. In principle everyone should have at least basic occupational health and safety knowledge. Everyone plays a role in the work with occupational health and safety. (p. 215)

The importance of OHS knowledge is demonstrated by the fact that the subject is included in both primary and secondary education. However OHS is not a compulsory part of educations at a university level in Sweden. In order to better prepare prospective managers and leaders the Inquiry (SOU 2013:25) suggests that basic courses in OHS should be a part of some university courses, which is emphasised by the following quote:

Therefore the Inquiry considers that basic occupational health and safety should be included in relevant university courses. It is for example important to teach which obligations the Work Environment Act imposes on employers and supervisors. Courses of significance are inter alia the Medicine Program and the Nursing Program but also the programs of Master of Engineering and Master of Business. The assessment is that occupational health and safety also, to a greater extent, should be an important element in the overall idea of making occupational health and safety to strategic issue and competitive tool. (p. 216)
The idea about turning occupational health and safety into a strategic tool is also a key finding in the Inquiry SOU 2009:47. The Inquiry (2009:47) raises the often debated question whether OHS can be financially profitable and suggests that is too difficult to actually claim. Instead the Inquiry (SOU 2009:47) suggests that OHS should be a strategic issue for organisations, which is expressed in following quote:

> Although many studies of changes in the occupational health and safety are difficult to interpret according to strict scientific criteria, and despite success stories certainly are over-represented in the literature, there is every reason to believe that good and systematic work with occupational health and safety leads to positive outcomes ... However, the next step - that occupational health and safety success means increased profitability in the monetary sense - is difficult to document. ... Anyone who wants to argue that the occupational health and safety should be an integral part of an organisation’s core activities might in that particular situation feel it is better to leave the financial calculations and instead emphasise the occupational health and safety in relation to the organisation’s success in strategically important areas of quality, creativity and social responsibility. (pp. 11-12)

**Occupational Health and Safety Research**

Research in the field of occupational health and safety is another key finding from the Swedish policy documents. One recurrent theme is the concern over the closure of the National Institute for Working Life (Arbetslivsinstitutet). In 2007 the Swedish Government decided to close down this research institute, based on following motive:

> The decision must be seen as part of the efficiency measure of the public administration and reduction of the state bureaucracy. The Government believes that research in the working life area remains important, however to ensure quality in research with such a focus it should be assessed by research funders in competition with others in the usual way. (Dir. 2007:42, p. 1)

One year later, in 2008, the Swedish Government decided to establish a Work Environment Policy Council (Arbetsmiljöpolitiskt kunskapsråd) with following main tasks:

> The Council’s tasks include:
> • to highlight and illustrate important trends in occupational health and safety
> • to contribute knowledge to support the formation of occupational health and safety policy. (Dir. 2008:101, p. 3)
The Work Environment Policy Council was established and in 2011 released a report of an Inquiry (SOU 2011:60) about needs and conditions for a national knowledge centre for occupational health and safety. The suggested knowledge centre for occupational health and safety would have five main areas: Business/competitive intelligence in order to monitor for a long-term the national trends in OHS; Knowledge surveillance in order to monitor and supply current OHS results; Accessibility of knowledge in order to facilitate networking among researchers and other stakeholders in the field of OHS; Placing together knowledge about OHS research where no other stakeholder contributes; and National representation within international OHS bodies and to be a referral organisation for international OHS issues (p. 11). According to the Inquiry (SOU 2013:25) this knowledge centre is now considered to be established within the Swedish Work Environment Authority (Arbetsmiljöverket) (p. 212).

During the Inquiry’s (SOU 2011:60) consultation process, opinions about the former National Institute for Working Life were raised, which is expressed in the following quote:

Many pointed out that they miss contact with the research organisations, which previously was met through the researchers at National Institute for Working Life, the institute’s library and information activities. (p. 24)

Also researchers opinions regarding the National Institute for Working Life were considered by the Inquiry (SOU 2011:60) which following quote explains:

Many researchers used the word “embarrassing” to describe the situation where Sweden does not have a central authority that can represent the country in EU agencies, WHO, and the network Partnership for European Research in Occupational Safety and Health (PEROSH) and also respond to requests from abroad. (p. 54)

Another Inquiry (SOU 2013:25) is also raising the need for adequate OHS research and emphasises that currently there is a lack of this element, which is expressed in the two following quotes:

No systematic evaluation with high academic quality on the effects of concentrated efforts on occupational health and safety is carried out. (p. 153)

The Inquiry has particularly emphasized the need for knowledge about occupational health and safety issues related to the psychosocial work environment and also the high level of sickness benefit among women. More research is needed about occupational health and safety, and this research should be
conducted with use of data and methods that to a greater extent enable assess causation. ... The Inquiry advocates for a new function of evaluation within the field of occupational health and safety. (p. 212)

The section above has outlined the key findings from the Swedish policy documents. The findings were presented under four themes: Work Environment and Regulation, Education for Elderly, OHS Training and Safety Representatives, Occupational Health and Safety Research. Below are the findings from the New Zealand policy documents.

New Zealand Policy Documents
One overall finding, according to the Independent Taskforce (2013), is that there is no single one: “critical component of the system that is responsible for New Zealand’s poor workplace health and safety outcomes” (p. 21). Instead the Independent Taskforce (2013) has identified a number of components in the OHS system that are not up to standards. Below are the key concepts retrieved from the policy documents selected from New Zealand. Many points were raised, however, the four themes presented below are repeatedly suggested across all documents and therefore will be explained more in detail. As a result of the text analysis conducted the four themes are: Culture, Regulation, Worker Participation, OHS Training.

Culture
Culture and attitudes towards OHS is a key finding from the Independent Taskforce’s (2013) report. The report describes main characteristics of New Zealanders, also called Kiwis, and the culture related to regulation around OHS. Numerous issues around culture and attitudes were expressed and they are summarised below.

In the Independent Taskforce (2013) the point of view of what characterises New Zealand’s national culture towards OHS matters is expressed in the following quote:

New Zealand’s national culture includes a high level of tolerance for risk, and negative perceptions of health and safety. There appear to be number of prevailing values and norms that are odds with a safety-conscious, harm-preventive and compliance-based workplace health and safety system. ‘It’s only minor’, ‘it won’t happen to me’ and ‘it’s all part of the work we do’ are some phrases that aptly capture this. (p. 34)
To better grasp something as large as a nation’s culture the Independent Taskforce (2013) further explains what characterises the New Zealand culture especially in regards to regulation in following quote:

Kiwi stoicism, deference to authority, laid-back complacency and suspicion of red tape all affect behaviour from the boardroom to the shop floor. (p. 34)

As a consequence of a suspicion towards bureaucracy and a laid-back approach towards regulation and OHS matters, the Independent Taskforce (2013) suggests that it leads to more workplaces where poor standards are being developed and accepted by both managers and employees (p. 34).

However cultural and attitudinal barriers to health and safety is not unique to New Zealand, which the Independent Taskforce (2013) exemplifies by referring to Robens’ report which:

... noted that “public apathy” over work-related safety issues in the UK was a fundamental concern. (p. 31)

Through the Independent Taskforce’s (2013) consultation process respondents reported that New Zealand’s culture was of major importance in relation to its poor health and safety record. These components are as follows:

*Complacency.* Our ‘laid back’, ‘she’ll be right’, ‘won’t happen to me’ attitudes to health and safety reflect a general complacency. *Passivity.* We often think that others are responsible for health and safety - we have low levels of individual self-responsibility. *Haste before care.* We have a productivity-focused ‘number 8 wire’ ... mentality. We will take shortcuts ... *Distaste for red tape.* New Zealanders are resistant to regulations and can see health and safety requirements as an unnecessary compliance requirement. *Tall poppy.* We can be reluctant to stand out or ask questions. ... we don’t wan’t want to seem stupid. *Stoic.* We value stoic qualities and ... talking about ... health and safety considerations may make us look like a ‘sook’ or that we need to ‘harden up’. (pp. 31-32)

In regards to haste before care, a productivity-focused attitude was also found by the Royal Commission (2012a), which following quote states:

Executive management, Messrs Ward, Whittall and White, was focused on hydro coal production, as was the board. Associated risks were not properly assessed. At the executive manager level there was a culture of production before safety at Pike River and as a result signs of the risk of an explosion were either not noticed or not responded to. (p. 19)
In relation to what was found by the Independent Taskforce’s (2013) consultation process mentioned above, they examined why many workplace harm-prevention programmes in New Zealand have been ineffective and they identify four main reasons. The first reason is that the programmes have focused on behaviours rather than the underlying reasons for the behaviours. The second reason is that they have been not given enough priority by the regulators. The third reason is that the programmes have not been comprehensive enough or presented a convincing need for an overall change. The fourth reason is that not enough time has been given to the programmes to implement the suggested changes. It is also noted that the harm-preventing programmes have not been as successful as other programmes such as those for energy efficiency and family violence (p. 31).

Regulation
The concern around regulation for occupational health and safety in New Zealand was presented as one of the key components in the documents read. Numerous issues surrounding the OHS regulatory system have had an impact on the overall performance and these matters are presented below.

New Zealand’s OHS legislative framework is regulated by a number of Acts. The Department of Labour (2011) explains the OHS legislative framework in the following quote:

Our workplaces do not operate in isolation. We have a legislative framework of statute and regulation in the Health and Safety in Employment (HSE) Act, the Hazardous Substances and New Organisms (HSNO) Act and the worker compensation and rehabilitation scheme (ACC), with associated standards and guidance. There are also a range of ... workplace-specific systems and processes. (p. 8)

The Independent Taskforce’s (2013) report gives a slightly different description of the OHS legislative framework, which following quote expresses:

New Zealand’s legislative environment is confusing. Multiple pieces of legislation, blending hazard- and risk-management specifications, fall across overlapping and ambiguous jurisdictional boundaries. (p. 21)

The legislative confusion is further explained later in the Independent Taskforce (2013) which indicates again a lack of clear information about how to comply with regulations but also why compliance is important (p. 23). In particular, small and medium sized enterprises (SMEs) found it hard to interpret and comply with the many regulations (p. 33).
Concern was expressed by the Independent Taskforce (2013) about gaps in the legislation. This is exemplified by the Independent Taskforce (2013) who state that:

... there are number of gaps in the legal framework. These include: the coverage of contractors and supply chains; directors’ duties; the regulation of major hazard facilities; and enforcement tools for inspectors. (p. 21)

Each of these key points are elaborated on further sections of the Independent Taskforce’s (2013) report. Key concerns are discussed around the coverage of contractors in conjunction with procurement, where the cheapest tenders are more likely to get the contract (p. 27). As for directors’ duties, the workplace environment has changed since the Health and Safety in Employment (HSE) Act was initially implemented and due to changing circumstances the current regulations are not clear about whose responsibility it is to prevent workplace harm. Therefore it is suggested that whom ever can prevent workplace harm should have an explicit obligation to do so (p. 53). In regards to regulation of major hazard facilities there are concerns that one type of industry has set regulations but another type of industry with similar hazards does not have the same regulations. For example the petroleum industry is covered but not chlorine storage by the current regulatory framework, which reflect gaps not only in regulation but also knowledge about major hazard facilities (p. 33). A regulator emphasising self-regulation (p. 23) and ineffective deterrence for non-compliance is suggested to lead to poor OHS performance (p. 29)

Another key finding from the Independent Taskforce (2013) regarding the regulator is a confusion and lack of co-ordination between different agencies which is further explained in following quote:

With a plethora of regulating agencies working in the injury-prevention and enforcement space, agencies lack co-ordination. There is a lack of accountability for delivering progressively better health and safety outcomes. (p. 21)

This is explained later in the Independent Taskforce’s (2013) report which states that regulating agencies do not collaborate or co-ordinate their harm prevention with the result of missed opportunities to create a better OHS record. Also different standards are applied by different regulators which leads to confusion and inconsistency for the participants (p. 23, p. 33). As a consequence participants sometimes get confused messages from different agencies (p. 64).
The Independent Taskforce (2013) claims that the implementation of the Robens’ model regarding tripartism has been ineffective in New Zealand:

It is the Taskforce’s view that weaknesses across the system are the direct result of a fundamental failure to implement properly the Robens’ health and safety model in New Zealand. (p. 20)

The Robens’ report had a significant impact on the New Zealand legislation in regards to occupational health and safety. Regulations adopted by New Zealand’s Health and Safety in Employment Act (HSE Act) was passed by the parliament in 1992. However when the Robens-based model was implemented in New Zealand it was later than in many other countries namely the UK, Australia and Canada, which also adopted this model. Also it was a lighter version of the model that was implemented in New Zealand which can be explained because of both local and historical factors. These factors are suggested to be: resource constraints with no reasonable funding for implementation; implementation in an era of deregulation; and liberalisation of the labour market in combination with a weakening union representation (Independent Taskforce, 2013, pp. 20-21).

New Zealand is lacking a strong and visible regulator which is supported by the Independent Taskforce (2013) who state that:

... there needs to be a smarter, stronger and more visible regulator. (p. 22)

The regulator, for a long period of time, has been under-resourced and under many organisational changes which both have resulted in low regulator presence and too few inspectors (Independent Taskforce, 2013, p. 24). The Royal Commission (2012c) also found the regulator ineffective and their view below:

DOL has been ineffective as the regulator of health and safety in the underground coal mining industry and its strategic approach to health and safety in general provides cause for concern. The reasons include:

• a lack of national leadership by the department, which has damaged its credibility;
• no shared responsibility at governance level, including the absence of an active tripartite body;
• not following the expert advice from NOHSAC on, for example, the need for approved codes of practice; and
• insufficient departmental focus and expertise regarding health and safety, especially at the senior management levels, caused by its multiple functions, its organisational structures and management groups, gaps in its multi-year strategies and planning, poor performance measures and infrequent self-review. (p. 296)
With concern to both regulation and the regulator the Independent Taskforce (2013) recommends a new stand-alone Crown Agency:

We need a new, stand-alone, well resourced health and safety agency that is effective in its enforcement and its provision of advice. (p. 39)

The new agency should be better equipped to deal with current issues but also to promote and support further and future research (Independent Taskforce, 2013, p. 50). The suggestion also includes to establish a sector-leading research, evaluation and monitoring function within the new agency in order to improve quality and availability of data on both workplace injuries and occupational health performance (p. 94). The importance of research is expressed in following quote:

Research helps us to monitor and enhance our understanding of workplace health and safety risks, and to improve responses to those risks. (p. 40)

Worker Participation
Worker involvement in workplace health and safety is further discussed in the report by the Independent Taskforce (2013) and refers back to Robens’ model where:

... effective worker participation is vital to managing health and safety issues successfully in the workplace. Yet it is an aspect of the New Zealand working environment that is too often ineffective and often virtually absent. (p. 24)

The Independent Taskforce (2013) further explores why worker participation is not up to standards. Workers have many rights and protections, such as:

... the right to raise health and safety issues in relation to their work, to have these addressed, and to refuse tasks where conditions remain unsafe. Formal mechanisms, including health and safety representatives and health and safety committees, are commonly used to support these protections. Evidence of agreed participation systems is also required from firms with 30 or more employees. (p. 24)

Although these rights exist, they are poorly implemented, if at all according to the Independent Taskforce (p. 24). Underlying reasons for low worker participation is further explored and suggested to be a consequence of the changing nature of work with an increase of self-employed,
temporary or other forms of non-standard work. However some workplaces have effective mechanisms for worker participation, others do not. The reasons for this uneven distribution between workplaces are, according to the Independent Taskforce (2013), numerous. Some of the reasons are expressed in the following quote:

... there is limited support in the legislation for worker engagement, e.g. smaller firms are not required to have formal participation mechanisms such as health and safety representatives. Further, the law does not ensure that there is sufficient time for health and safety representatives to perform their functions. (p. 24)

As mentioned previously, some workplaces have effective mechanisms for worker participation, but others do not. Other reasons than the expressed above are a lower grade of unionisation and employees often lack an understanding of their rights. Furthermore many businesses prioritise profits over OHS concerns (Independent Taskforce, 2013, p. 24)

The management awareness of the need for workers’ representation is also suggested to be an issue. During the consultation process of the Independent Taskforce (2013) many employees raised complaints:

... about health and safety strategies and systems being absent, or run without adequate employee representative consultation (e.g. management-heavy health and safety committees). (p. 25)

The issue with lacking worker representation in committees is further explained by the Independent Taskforce (2013) describing scenarios where safety representatives are appointed by management, which questions their independence (p. 25).

It is not only managers that are being blamed in the Independent Taskforce (2013) but also employees:

... characterised as commonly lacking awareness of their rights and responsibilities, and not ready to engage. They were sometimes described as “complacent” and “apathetic” about health and safety protocols, regarding them as “over the top” or “petty”. (p. 25)

Fear among employees can be another issue stopping worker participation. For example the Independent Taskforce (2013) noted that:

Some reported being fearful of recriminations through pay docking (e.g. if damaged machinery was reported) or losing their jobs. (p. 25)
Workers in non-standard work arrangements were especially unlikely to raise complaints or concerns, because of the potential fear of loosing their jobs (Independent Taskforce, 2013, p. 25).

**OHS Training**
The importance of training in OHS is a key point raised in the Independent Taskforce’s (2013) report and is mentioned throughout the document as an important role for establishing a better OHS record in New Zealand. It is also stressed in the report that currently there is a lack of OSH training among many participants.

OHS training is frequently referred to by the Independent Taskforce (2013) in relation to leadership. It is not only the employers that are pointed out as playing an important role in good leadership, but also government, industry bodies, unions, the medical profession, other professions including media, and safety representatives. Worker participation and industry networks are pointed out as important factors for adequate leadership, as is OHS training. The lack of OHS training is a contributing factor to inadequate leadership, which following further explains:

> ... contributing factors to inadequate leadership are the generally low health and safety capabilities within many businesses, and the lack of external training, expertise and support available. (p. 26)

The reasons for a lack of OHS training are suggested by the Independent Taskforce (2013) to be a lack of qualified or accredited professionals and the few OHS professionals that do exist are hard to get access to (p. 25) and for SMEs it is difficult to afford them especially after the Tertiary Education Commission has reduced funding for OHS training (p. 28).

Tertiary education in OHS is according to the Independent Taskforce (2013) not up to standard. Also management competence in OHS is an issue, which following quote states:

> Management awareness, capabilities and training in health and safety are limited and variable. (p. 26)

Although some universities include OHS components in professional degrees (Independent Taskforce, 2013, p. 112) it is not believed to be sufficient, which is supported by the following quote:

> The quality, consistency and availability of tertiary education in health and safety matters are weak. (p. 26)
The concern over the lack of a manager’s OHS knowledge is further discussed by the Independent Taskforce (2013), which following quote expresses:

Managers, in particular, were often seen as inadequately prepared to manage workplace health and safety. Reasons given included a low focus on health and safety at secondary-school level and within tertiary-level professional degrees (e.g. commerce, engineering). (p. 28)

There are gaps in the field of OHS not only within tertiary education but also in earlier stages of New Zealand’s education which the Independent Taskforce (2013) states:

Too little emphasis is placed in workplace health and safety in New Zealand’s education and training system. This ranges from primary and secondary school to the vocational and tertiary sectors, and includes on-the-job training and continuing professional development. (p. 27)

The importance of understanding OHS at an early age is further discussed by the Independent Taskforce (2013) which makes recommendations in regards to the improvement of this for the new stand-alone Crown Agency:

... the new agency should consider what priority should be given to activities that support students learning about general safety and risk awareness at the early childhood education (ECE) and primary school levels. (p. 111)

Regarding vocational training the Independent Taskforce (2013) notes a shift from OHS training formerly integrated as a core part of the apprenticeship training, and now has become an additional and outsourced part (p. 28). The Independent Taskforce (2013) also stresses the importance of OHS training from an early stage of the education system, in order to establish a consciousness among individuals who eventually later will become managers (p. 28).

Not only lacking OHS knowledge among managers but also workers is raised by the Independent Taskforce (2013). But in terms of the workers also other issues are expressed, which following quote states:

... a concern for the limited health and safety knowledge of many workers. The most vulnerable and at-risk groups include young workers, who frequently lack both risk awareness and management skills, and workers with low literacy and numeracy levels, including early school leavers and migrants with poor English language skills. (p. 28)
Concerning available OHS training the Independent Taskforce (2013) raised comments noting there is no meaningful framework for OHS training. Among health and safety experts providing advice and training there is a variability in terms of their approach, risk tolerance and competence, which is stated by following quote:

... there is no standard competence level or qualification set required for consultants. (p. 28)

During the consultation process of the Independent Taskforce (2013) criticism was raised towards current training providers who:

... were criticised for offering a plethora of courses of variable content to a range of quality standards. (p. 28)

This criticism was also reflected by the mixed views on the effectiveness of OHS training for safety representatives that the Independent Taskforce (2013) received during their consultation process.
6. DISCUSSION

Introduction
The aim of this section is to bring together the findings from the policy documents with other reviewed documents around the area of occupational health and safety. In doing this it is hoped that it may lead to a greater understanding about what structures and policies regulate OHS matters in Sweden and New Zealand comparatively. It is also hoped that this may lead to a greater insight into policy conversation around OHS training in both Sweden and New Zealand. The title of this research report is: An Occupational Health and Safety Conversation: The Swedish and New Zealand Perspective. The three research questions are: 1) What structures and policies regulate occupational health and safety matters in Sweden and New Zealand? 2) What characterises both the Swedish and New Zealand work environment? and 3) What is the policy conversation around OHS training in Sweden and New Zealand? Five main themes have come as a result of the research. Under each theme both Sweden and New Zealand are discussed comparatively. The five themes that will be discussed are as follows:

• Work Environment and Regulation
• OHS Training and Attitudes
• Workers Participation
• OHS Research
• Longer Working Life

Work Environment and Regulation
Throughout the Swedish and the New Zealand policy documents alike, there was frequent mention of issues involving the working environment and the regulations to govern. Although the working environment and the workplace regulations were mentioned in each respective country's documents, the conversation around this theme was markedly different. The following section will look more closely at how both the Swedish and the New Zealand policy documents discuss OHS regulation and will highlight the key issues from each. It is the aim of this section to explore and describe comparatively the structures and policies that regulate OHS matters in Sweden and New Zealand and to highlight the differences and better understand the current regulatory climate in the respective nations.
The Work Environment Act in Sweden covers many aspects of working life. The regulations covering work environment includes more than just occupational health and safety (Hörte, 2009a) but all factors and conditions in relation to work (SOU 2013:25, p. 106). This is a notable difference to the New Zealand conversation around occupational health and safety, where focus is more on the physical dangers and less on the psychosocial. This may be because of the recent mining disaster at Pike River coal mine, but also because of the New Zealand use of the term OHS compared to working environment used in Sweden.

Psychosocial matters are an frequently mentioned issue throughout the Swedish policy documents. The issues are found across many industries and sectors especially within female-dominated sectors, such as Councils and Counties, psychosocial pressure and stress is an OHS issue. Females are overall, even in the private sector, subject to a poorer work environment in regards to psychosocial matters. Also, an increasing number of workers are taking work home and are finding it hard to maintain a work-life balance (SOU 2013:25). The psychosocial matters can be seen in relation to the development of OHS and the three waves of OHS, where psychosocial matters became a part of the term since the 1970s (Thörnquist, 2008). The third wave, mandatory OHS management and self-regulation, could explain why regulating OHS seems to be more difficult than other sectors, such as education or care, which is a finding in the Swedish policy documents (SOU 2013:25, p. 153). It is a challenge, but still important, to maintain an agressive health and safety policy (SOU 2013:25, p. 153), which inter alia is linked to creating a longer working-life.

Good OHS standards are seen as an important way to ensure a longer working-life in Sweden. The retirement age has been a question for political discussion and improved OHS standards are proposed to play a key role in creating a more sustaining working-life for the working population. Although the focus of the Inquiry is on older workers, younger workers are also of interest, since preventive actions may counteract later illnesses and injuries (SOU 2013:25).

There is no expressed need for changing the current OHS legislation in Sweden, however more effort and funds for certain activities, such as preventive work including investments OHS training, are suggested (SOU 2013:25, p. 153). That no changes in the legislation are suggested in the Swedish policy documents is in contrast to what is suggested in some of the New Zealand documents. One of the main concerns is that the OHS legislation in New Zealand is found across many acts adding great confusion. However other policy documents suggest that the different acts are complementing each other. These different views within the New Zealand policy documents are expressed by both Department of Labour (2011) and the Independent Taskforce (2013).
Department of Labour (2011) believes that the legislative framework of OHS do not operate in isolation (p. 8) and that the different acts complement each other. Notably the Independent Taskforce (2013) takes a different viewpoint on the many different regulations and suggest that the legislative framework is confusing (p. 21).

Throughout the Independent Taskforce (2013) the opinion can not be mistaken, the legislation is confusing because it is regulated by many acts. Despite many acts, it is also suggested that there are gaps in the legislation. The gaps presented include inadequate coverage of contractors and supply chains, unclear duty of care in the legislation, and a lack of consistency between major hazard industries (p. 21, p. 27, p. 33).

Many agencies interpret the acts differently and lack of co-ordination between the agencies is another issue that creates confusion. The lack of co-ordination also leads to missed opportunities to create a better OHS record, since each agency undertakes their own activities (Independent Taskforce, 2013, p. 21, p. 23, p. 33). Different messages from different agencies (p. 64) is therefore not a surprising consequence.

A failure to properly implement the Robens’ model is a key reason for weaknesses in the New Zealand OHS system (Independent Taskforce, 2013, p. 20). The failure to properly implement the Robens’ model is because of several reasons i.e. resource constraints, and that it was brought to New Zealand in an era of decreasing unionisation and deregulation (Independent Taskforce, 2013, pp. 20-21) leading to difficulties to ensure adequate worker participation. Perhaps the wind has changed, from beliefs in pure neo-liberalism (Lamm, Rasmussen & Anderson, 2013, p. 184) since the Independent Taskforce (2013) now expresses a need for a stronger and more visible regulator (p. 22). A new well resourced regulator, a stand-alone Crown Agency, is suggested to better deal with the current issues of New Zealand’s poor OHS record (p. 39). For a long period of time the regulator has been under resourced, therefore it is not surprising that requests were made for a new, well resourced Agency. The demand for one stand-alone Agency can be seen in relation to the current plethora of agencies.

**OHS Training and Attitudes**
Throughout the Swedish and the New Zealand policy documents training in occupational health and safety is frequently mentioned. Although OHS training and the regulations concerning these matters were mentioned in both country’s documents, the conversation around this theme were in some respects markedly different. The following section will look more closely at both the Swedish and
the New Zealand policy documents and the mentioning of OHS training and will highlight the key issues from each. It is the aim of this section to seek insight into the policy conversation around OHS training in Sweden and New Zealand.

Safety representatives play a key role for well functioning occupational health and safety, which is confirmed in both the Swedish and the New Zealand policy documents (SOU 2013:25, p. 215; Independent Taskforce, 2013, p. 24).

In order for the safety representatives to fulfill their duties OHS training is vital. However regulations around OHS training for safety representatives are different in Sweden and New Zealand. Safety representatives in Sweden are entitled to paid leave for attending OHS training. There is is no specification in the regulations about how many days per year, but instead the need to fulfill the safety representatives duties is indicative of the number of days (SOU 2013:25, p. 214). Comparatively, the New Zealand safety representatives are entitled to only two days paid leave annually to attend OHS training which is raised by Harris (2011). This has, surprisingly, not been raised by the Independent Taskforce (2013).

OHS training in Sweden has been, as still is, partly tax-payer funded but in the 1990s the funding was reduced by the closure of the Work Environment Fund and the dissolution of the central agreements between LO (Swedish Trade Union Confederation) and SAF (Swedish Employers’ Confederation) (Thörnquist, 2008). Nowadays, OHS training is mainly provided by the unions, not-for-profit organisations, Prevent, as well as privately owned companies (SOU 2013:25, p. 214). The reduced funding for OHS training is also noted in New Zealand, making it harder especially for SMEs to afford OHS training after the Tertiary Education Commission has reduced funding for OHS training (Independent Taskforce, 2013, p. 28).

The changes to the labour market can also be seen in relation to OHS training. As a consequence of the decreasing unionisation in Sweden more safety representatives do not get required OHS training and weakens the safety representatives function in the work environment work (SOU 2013:25, p. 214).

OHS knowledge obtained through training is not only a matter for safety representatives, which is a shared view in both the Swedish and the New Zealand policy documents (Independent Taskforce, 2013, p. 28). In Sweden OHS is a matter for everyone with some some form of involvement in the labour market (SOU 2013:25, p. 215).

The lack of OHS training in New Zealand is explained through numerous avenues. Firstly, there is a limited number of qualified or accredited OHS professionals, and those who exist are hard
to access and, as previously mentioned, difficult to afford especially for SMEs (Independent Taskforce, 2013, p. 28)

To address the lack of OHS training in both Sweden and New Zealand suggestions are made to implement OHS of training in the wider education system. However, the countries differ with regards to this matter. In Sweden OHS training is already implemented in both primary and secondary education (SOU 2013:25, p. 216), in contrast to New Zealand where too little emphasis is placed on OHS in New Zealand’s education and training system (Independent Taskforce, 2013, p. 27). The need for OHS training at a tertiary level is expressed in both the Swedish and the New Zealand documents (SOU 2013:25, p. 216; Independent Taskforce, 2013, p. 27).

OHS knowledge is linked to leadership and management in both the Swedish and New Zealand policy documents (SOU 2013:25, p. 215; Independent Taskforce, 2013, p. 26). As a response to the lacking OHS knowledge among managers there are suggestions made in both Sweden and New Zealand to incorporate compulsory OHS training in some university programs to better prepare prospective managers and leaders (SOU 2013:25, p. 216; Independent Taskforce, 2013, p. 28) who were seen as often inadequately prepared from their tertiary education to manage OHS.

Attitudes and culture towards OHS in New Zealand is a key finding in the policy documents. The New Zealand culture to OHS is characterised by high tolerance for risk, negative perceptions of OHS, and negative perceptions of bureaucracy. Kiwi stoicism and attitudes to OHS often reflect complacency (Independent Taskforce, 2013, p. 34). Education and training is one of many tools to change prevailing attitudes and therefore suggestions are made to incorporate OHS elements from an early stage of the New Zealand education system (p. 111). To use training as a tool to change individuals' attitudes is also supported by researchers (e.g. Lauder, Brown, Dillabough & Halsey, 2006; Lingard & Yesilyurt, 2003; Mattsson, 1995; Wilhelmson, 2004).

Worker Participation
Throughout the Swedish and the New Zealand policy documents worker participation is pointed out frequently. The findings suggest that worker participation is a key component in achieving a good OHS performance. Although worker participation is mentioned in both the Swedish and the New Zealand documents, the conversation around this theme varies. The following section will look more closely at both the Swedish and the New Zealand documents in regards to worker participation and will highlight the key issues from each. It is the aim of this section to describe comparatively the structures that regulate worker participation in Sweden and New Zealand.
Safety representatives in Sweden possess an unique position and the Work Environment Act states that co-operation regarding OHS matters should be conducted between employers and safety representatives. Worker participation as an explicit requirement is clear. The safety representatives are defined as the employees' representative in this role (SOU 2013:25, p. 214).

The safety representatives in Sweden are entitled to numerous rights, such as taking note of OHS documents, playing an active role in planning and implementation of changes in the workplace that have an impact on OHS, and also entitled to paid leave to such an extent that is necessary to fulfill their duties (SOU 2013:25, p. 214). The safety representatives in New Zealand are also entitled rights, e.g. refuse tasks where conditions remain unsafe (Independent Taskforce, 2013, p. 24).

Although rights for the safety representatives exist both in New Zealand and Sweden, it is only in the New Zealand policy documents these rights are described as not fulfilled. The reasons for weak worker participation in New Zealand is to be found in not adequate legislation, especially concerning smaller organisations which are not required to have safety representatives. Another reason is suggested to be insufficient time for the existing safety representatives to fulfill their duties (Independent Taskforce, 2013, p. 24).

Other reasons for weak worker participation in New Zealand are suggested to be a result of a lower grade of unionisation, worker's limited knowledge about their rights, worker's often complacent attitudes towards OHS, management-heavy health and safety committees and scenarios where employers and not unions appoint the safety representatives (Independent Taskforce, 2013, pp. 24-25). Only because worker participation is not mentioned to be an issue in the Swedish policy documents it would be a too far-reaching conclusion to suggest this system is well-functioning. The weakening system of worker participation is frequently mentioned among many scholars (e.g. Frick, 2009; Sandberg & Movitz, 2013; and Thörnquist, 2008).

OHS Research
Especially throughout the Swedish, but also to some extent in the New Zealand, policy documents OHS research is mentioned frequently. Although the importance of OHS research is stressed in both the Swedish and the New Zealand policy documents the conversation around this theme is notably different. The following section will look more closely at both the Swedish and New Zealand documents regarding OHS research and will highlight the key issues from each. It is the aim of this section to describe comparatively the ideas that each country have regarding OHS research and its importance in keeping workplaces safe.
OHS research can help to both monitor and enhance understanding of workplace health and safety risks. The research can also improve responses to those risks (Independent Taskforce, 2013, p. 40).

The conversation around OHS research in Sweden is predominantly related to the closure of the National Institute for Working Life (NIWL). According to the Swedish government the closure of the institute was a part of reducing state bureaucracy and in terms of funding a desire to equate OHS research with other research (Dir. 2007:42, p. 1). The closure of NIWL caused debate both politically, which is not a subject for this report, and not surprisingly among the scholars employed at the institute (e.g. Frick, 2009; Thörnquist, 2008). Also subsequent Inquiries (SOU 2011:60 and SOU 2013:25) explored the consequences of the closure of NIWL. Researchers expressed the closure as indecent to Sweden (SOU 2011:60, p. 54).

One year after the closure of NIWL the Swedish government established a Work Environment Policy Council (Arbetsmiljöpolitiskt kunskapsråd) (Dir. 2008:101) which presented needs and conditions for a national knowledge centre for occupational health and safety (SOU 2011:60). The Inquiry SOU 2013:25 found that there is a lack of systematic OHS research in Sweden (p. 153).

Noteworthy, six years after the closure of NIWL and an intensive debate, both on policy and academic level, the Inquiry (SOU 2013:25) advocates for an establishment of a new OHS research and evaluation function in Sweden. The expressed needs for research are particularly around psychosocial matters in the work environment, causation, and the high level of sickness benefit among women (p. 212).

The expressed research needs can be seen in relation to a wider political discussion in Sweden around work, working life, and that everyone should be able to work at least to their capacity for work, and the high levels of sickness benefits in Sweden. It can also be seen in relation to the development of OHS (Thörnquist, 2008) where improvements in the physical work environment has lead to improvements and where nowadays psychosocial matters have become more of a priority. Although psychosocial matters are of great concern, musculoskeletal injuries are also of importance, since this is the most common occupational illness leading to sick leave (SOU 2013:25, p. 215).

OHS research is in the New Zealand policy documents primarily referred to when positioning New Zealand and its poor OHS performance in comparison to other countries. It is also referred to OHS research when suggestions are given about how to improve the OHS record in New Zealand. Similar to Sweden, it is recommended to establish a new research function. The suggested
new stand-alone Crown Agency should, among many responsibilities, also house a sector-leading research, evaluation and monitoring function in order to improve quality and availability of data on both workplace injuries and occupational health performance (Independent Taskforce, 2013, p. 94).

**Longer Working Life**

In the Swedish policy documents OHS in relation to a sustainable working life is pointed out. The findings suggest that a good OHS performance and an adequate work environment fitted for in particular elderly people are important factors in order to create a longer working life. Since such findings are not found in the New Zealand policy documents this section mainly focuses on the Swedish policy documents. New Zealand is, however, also facing changes in their demographics, despite not being mentioned in the policy documents, and therefore a longer working life is also of concern to New Zealand. This section starts with a summary of some major changes that have consequences on the labour market and thereafter looks more closely at the Swedish policy documents in regards to elderly workers and OHS.

Many societies have undergone, and are still undergoing, major changes that affect the fundamentals of both society and labour market. The changes to the labour market can be observed in the changing nature of work, with an increase of small and medium-sized enterprises, use of outsourcing and subcontracting, decrease of unionisation, increase of different forms of non-standard employment (e.g. Adler, 2013; James, 2004; Walters & Frick, 2000) creating a new emerging class - the precariat (Standing, 2011). The changes to the nature of work and development of OHS (Thörnquist, 2008) across many industries and professions has lead to new risks and hazards in workplaces (SOU 2013:25) but also the demographics in society has changed with an increase of elderly people. People are living longer. Although this means that the current retirement system demands the employed to support an increasing group of individuals who are both living longer and also demand a greater need for care (SOU 2013:25, p. 124).

A key finding in the Swedish policy documents is OHS in relation to elderly workers. Changes in the working environment are needed in order to sustain a longer working life. Also efforts are needed in investment in skills development through training and increased efforts to find a new job rather than a permanent exit from the labour market (SOU 2013:25, p. 140). Education for older workers can be seen as a logical continuation based on the requirement to adjust to the work environment and work conditions based on each individuals’ needs, stated in the Work Environment Act (SOU 2013:25, p. 152).
Entry requirements to different types of education are not found to be the major obstacle for elderly to undertake further education. Instead income loss and limitations for elderly to get financial aid from the National Board of Student Aid (CSN) are pointed out to be the problem. Also a lack of training courses adjusted to fit elderly is seen as a barrier for older workers to undertake further education or training (SOU 2013:25, p. 161).
7. FINAL CONCLUSIONS
Based on the discussion, this section outlines some final conclusions made by the researcher. Eight conclusions have been made based on the undertaken research. This section ends with a final reflection.

Conclusion One: OHS Regulation
Throughout the Swedish and the New Zealand policy documents alike, there was frequent mention of issues involving the work environment and the regulations to govern. Although the work environment and the workplace regulations were mentioned in each respective country's documents, the conversation around this theme was markedly different. The main differences between Sweden and New Zealand are that in Sweden the work environment legislation is suggested to be adequate and no major amendments to the current legislation are impending or required. This is in contrast to New Zealand where major changes to the OHS legislation are called for.

Conclusion Two: Work Environment and OHS
As noted in previous section (Definitions of OHS: Sweden and New Zealand) different terminology is used in Sweden and New Zealand namely work environment and occupational health and safety comparatively. This is of interest because it highlights the difference in focus between countries. Based on this research it appears that Sweden has a more holistic view, including not only physical and psychosocial matters but also the workers' own active role in creating a stimulating working life. Comparatively New Zealand uses the term OHS which indicates a more specific focus on safety and the prevention of work-related harm. This reflects a difference in perception of working life as well as what role the worker is given in the legislation.

Conclusion Three: Inadequate Training for Safety Representatives
There has been conversation in the Swedish policy documents outlining that safety representatives are not always receiving adequate training, this is also reflected in the New Zealand policy documents.
Conclusion Four: Paid Leave for Training
In Sweden safety representatives are entitled to sufficient paid leave to fulfill their duties including training. In contrast to New Zealand where safety representatives are entitled to only two days paid leave annually to attend OHS training.

Conclusion Five: OHS Training
In Sweden OHS training is incorporated in both primary and secondary education, in contrast to New Zealand where little to no emphasis is placed. In both countries it is suggested that OHS training becomes a key component in tertiary education programs, to better prepare prospective managers and leaders. The need for further OHS training at a tertiary level was described and discussed in similar ways in both the Swedish and the New Zealand policy documents. OHS training is suggested to be of high importance and a way to impact people’s attitudes towards OHS matters.

Conclusion Six: Worker Participation
The importance of worker participation is emphasised in both the Swedish and the New Zealand policy documents. Due to the fact that the Robens’ model was not fully implemented in New Zealand, worker participation was not adequately regulated until the Health and Safety in Employment Amendment Act 2002.

Conclusion Seven: OHS Research
OHS research was found to be of significant importance in order to understand, monitor and evaluate the current OHS climate. In 2007 the National Institute for Working Life in Sweden was closed down. Upon re-evaluation it was realised that there is a need for a new entity for OHS research and evaluation. Similarly the Independent Taskforce has made recommendations about also establishing something similar in New Zealand.

Conclusion Eight: Changing Nature of Work
The changing nature of work is highlighted as a concern in the policy documents. The legislation in both countries does not adequately cover the new forms of work and is not conducive to OHS. Workers in precarious employment are less likely to speak up due to fear of loosing their jobs.
Final Reflections

Many differences were observed between Sweden and New Zealand’s structures and policies that regulate OHS matters. Notable differences have been discussed throughout. A greater understanding has been gained about the policy conversation around OHS training in both the countries. It is clear from this research that the Swedish work environment is characterised by a more holistic approach. It is also evident that OHS matters arise from many contextual, historical and political influences. When making comparisons between two countries it becomes obvious that a simple exchange of systems is not feasible. However it is believed that there is always room for an exchange of ideas.
8. LIMITATIONS OF THIS STUDY

This research is based on a small sample size due to the researcher's limited time and resources. To further validate this research a wider scope of policy documents could be analysed. This research could also be triangulated through the use of interviews with key experts, workers, and other key stakeholders from each respective country.

No ethical approval was sought after because no human participants were required for the research. Only public information was analysed; no private or personal information was included.
9. REFERENCE LIST


ILO. (2012). From precarious work to decent work: outcome document to the workers' symposium on policies and regulations to combat precarious employment / International Labour Office, Bureau for Workers' Activities. Geneva: ILO


