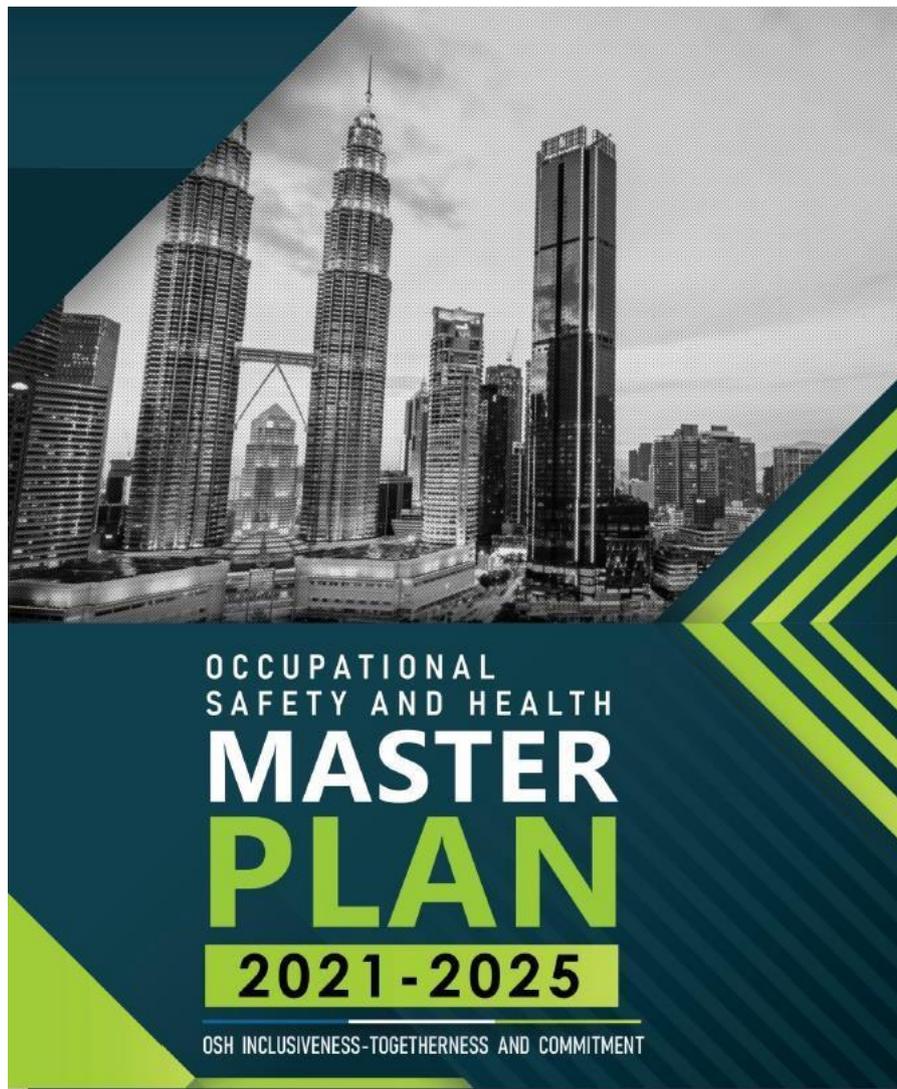




Malaysian Occupational Safety and Health Master Plan 2021–2025

IOSH response to the Department of Occupational Safety and Health (DOSH), Ministry of Human Resources, Malaysia – December 2020



Introduction

The Institution of Occupational Safety and Health (IOSH), the Chartered body for occupational safety and health professionals, with around 47,000 members in more than 130 countries, works to advance a safe and healthy world of work, through our WORK 2022 Strategy themes of enhance, collaborate, and influence.

IOSH welcomes the opportunity to comment on this important draft *Malaysia Occupational Safety and Health Master Plan 2021–2025 – OSH inclusiveness – togetherness and commitment* (OSHMP25). We commend all those involved for their work in progressing this latest development in Malaysia’s journey towards a national health and safety culture that supports delivery of the national OSH policy, the Vision Zero initiative and the United Nations Sustainable Development Goals (SDGs).

IOSH is pleased to see the aim of achieving significant transformation in Malaysian OSH by 2025, with intended outcomes that include: improved OSH governance; self-regulation; education and research; occupational health enforcement; SME practices; technology in

OSH practice; and road risk management. We welcome the strong focus on occupational health issues. This is vital, given the pressing need across the world to prevent exposures to occupational health hazards and the development of health conditions such as musculoskeletal and mental health disorders and noise-induced hearing loss; and lung and skin diseases, including occupational cancers. IOSH also welcomes the imperative for organisations to support older workers and healthy extended working lives.

We believe it is very positive and helpful to see the OSHMP25 commitment and plans for supporting and nurturing OSH capacity-building, helping ensure sound foundations for a more risk-intelligent society and for a safe, healthy and sustainable future. It is also pleasing to see the focus on meeting the OSH needs of potentially vulnerable groups, such as those working in small and medium-sized enterprises (SMEs) and the gig economy; and those of female, foreign and informal workers.

In the response that follows, we provide some general comments on the introduction to OSHMP25, and then outline detailed suggestions for consideration under each of the seven strategies, closing with relevant IOSH resources, references and further information about IOSH.

Background

IOSH has been honoured to engage with the Malaysian Department of Occupational Safety and Health (DOSH) and other like-minded national bodies to better understand the OSH system in Malaysia and advance co-operation plans with partners locally. Some examples of these interactions can be seen in our recent collaboration with the Malaysian Board of Technologists and the ongoing work with key OSH organisations, including the National Institute of Occupational Safety and Health (NIOSH), the Malaysian Society for Occupational Safety and Health (MSOSH), and the Malaysian Occupational Safety and Health Practitioners' Association (MOSHPA), to enhance OSH competencies and explore many ways IOSH and these organisations can work beneficially together. We have been pleased to meet with the Director of the Malaysian Social Security Organisation (SOCSSO) and to have a joint presence on the International Social Security Association (ISSA) Global Council for Vision Zero. IOSH is also pleased to accredit several Malaysian University / College OSH courses in connection with our membership.

IOSH is keen to support the work of the Asia-Pacific Occupational Safety and Health Organisation (APOSHO) and has also been involved in hosting its annual conference. We are active in the Asia-Pacific region through our Singapore and Hong Kong Branches, with OSH professional members from Malaysia, Singapore, Indonesia, Sri Lanka, Brunei, Thailand, China and Hong Kong. We have also led awareness and dissemination activities on preventing occupational cancer through our *No time to lose* campaign activity.

General comments on the OSHMP25 introduction

Covid-19 pandemic

As the world struggles with the Covid-19 pandemic, we note media reports of clusters of cases in countries involving manufacturing and processing industries.¹ As other countries in the region have been advised,² Malaysia may wish to consider further building on risk management capabilities to strengthen workplace resilience in the ongoing fight against Covid-19 and to safeguard against future outbreaks of communicable diseases at work. The master plan can encourage organisations to enhance their pandemic preparedness, both now and in the longer term, through risk management and prompt response strategies, as part of their business continuity plans.

Stakeholder engagement

We note the draft OSHMP25 (p.3) explains that DOSH and local authorities have “...*limited resources and a relatively minimal information dissemination mechanism...*” and we welcome its aim to for an inclusive, comprehensive and national approach, involving stakeholders, NGOs and the public. We suggest DOSH could also consider the work of the Singapore Workplace Safety and Health (WSH) Council, which includes members from industry, government, unions, employers and the legal, insurance and academic fields. The Council works with the Ministry of Manpower and other government agencies, tripartite partners, industry and professional associations to develop strategies to raise WSH standards in the country and includes a focus on outreach (with campaigns and awards) and OSH competence- and capacity-building. In addition, DOSH might also consider the work of the International Advisory Panel (IAP) for workplace safety and health, which harnesses input from OSH and regulatory experts from around the world to share strategic insights.

Vision Zero

We welcome Malaysia’s commitment (p.4) to the International Social Security Association’s (ISSA) project Vision Zero, formally launched in Malaysia in July 2019. IOSH is a long-standing member of ISSA, via its Special Commission for Prevention; chairs its Education and Training Section; and has supported Vision Zero as it evolved. Further to this, ISSA and IOSH have now co-developed the Vision Zero training package, together with an accreditation process for Vision Zero training providers. IOSH was also pleased to participate in an international workshop on OSH policy indicators, at which the Vision Zero proactive leading indicators project was presented.³

Quality of work environment

The draft OSHMP25 (p.7), emphasises the importance of the quality of the work environment and outlines that this is assessed using the rate of accidents at work, corporate disputes, loss of working days due to corporate actions and average working hours. IOSH recommends DOSH may also be interested to consider the Eurofound concept of quality of work and employment based on four key dimensions: ensuring career and employment security; maintaining the health and well-being of workers; developing skills and competencies; and reconciling work – life balance.⁴

Industrial revolution 4.0

The document (p.9) usefully explores the OSH implications of the Industrial Revolution 4.0 (IR4.0) and we suggest it could consider highlighting the content of the international standard *ISO 27500: 2016 The human centred organization – Rationale and general principles*.

Updates for stakeholders

As part of its engagement and communications work, DOSH may wish to consider providing annual updates during the five-year master plan delivery and to review and adjust the supporting programmes if required.

Suggestions to be considered within the OSHMP25 strategies

Strategy 1: Strengthening Government Leadership (p.22) International standards

In addition to alignment with the Malaysian Well-being Index, as well as reference to UN SDGs 3 and 8, we suggest there could be more emphasis on the Decade of Action (2020–2030) and other OSH-related goals, with reference in Strategy 1 to SDG17 – revitalise global partnerships.

We note that Malaysia reported on OSHMP15 at the ILO's 106th Session (2017) *Working together to promote a safe and healthy working environment*, as part of the General Survey on the OSH instruments concerning the promotional framework, construction, mines, and agriculture. We suggest that OSHMP25 could further seek to promote the principles of the relevant OSH-related ILO Conventions, including for example 155, 161,

162 and 170 (standards for maintaining OSH and the safe management of hazardous substances at work).

In addition, the master plan could highlight global policy developments that promote the need for businesses and investors to demonstrate respect for human rights, including labour and OSH rights. These include, for example, the UN Guiding Principles on Business and Human Rights (which mark their 10th anniversary in June 2021) and the Organisation for Economic Co-operation and Development's expectations of responsible business conduct for institutional investors. Investors are also expected to respect the ILO core standards and to work with investment recipients to ensure that they respect human and labour rights.

We suggest that the aims of OSHMP25 to incentivise comprehensive OSH could encourage organisations to go beyond minimum OSH compliance in the sustainability agenda, recognising the benefits to individuals, employers and communities of delivering long-term socio-economic value and the UN SDGs. We note that on 24 June 2019 the Minister of Laws, YB Liew, formally announced a cabinet decision to launch a process to develop a business and human rights National Action Plan. Malaysia may wish to consider developments from other jurisdictions, including the Modern Slavery Act in the UK and ongoing discussions around mandatory human rights due diligence in the European Union, as highlighted in the European Parliament 2017 study *Implementation of the UN Guiding Principles on Business and Human Rights*.⁵

Also, as stakeholder appetite for non-financial reporting and ESG (environment, social and governance) data grows, IOSH advocates improved corporate transparency on OSH performance as a driver to improvement and to enhance the social licence to operate. We suggest that this could helpfully be included in OSHMP25 or elsewhere, referencing appropriate international standards, such as *GRI403: Occupational Health and Safety 2018*, which IOSH was pleased to help develop. In addition, the text on procurement (Strategy I, Programme 4) could usefully refer to the international standard *ISO 20400: 2017 Sustainable procurement – Guidance*.

The DOSH may wish to consider working across government departments with respect to OSH and trade and investment. In our recent Policy Hackathon submission to the UN-WTO,⁶ IOSH highlighted that the Association of Southeast Asian Nations (ASEAN) Economic Community, formed in 2015, seeks to promote freer flow of investment, goods and services, and skilled labour movement in the region. And in support of this, it reports working on minimising trade barriers through harmonising standards, such as on OSH, in line with the ILO's standards.⁷ The ILO highlights studies arguing that labour-market outcomes depend on institutional factors, such as government capacity to monitor rights and conditions and that, in this regard, trade-related labour provisions could be seen as one way to “boost the benefits of growth, minimise costs and tackle inequalities.”⁸

The inclusion of labour provisions in trade is a growing current trend and is notable in the European Union – Vietnam trade and investment agreements. For these, it is intended that they will promote sustainable development on both sides, with strong commitments to the ILO Conventions on fundamental rights at work and high standards of labour protection. Importantly, the European Union aims to secure such agreements with the whole ASEAN region.⁹

The master plan rightly highlights the priority of meeting the needs of foreign workers, including strengthening OSH management, induction courses and OSH knowledge. This is vital, given that often the working conditions associated with migrant workers can be the so-called 3D (dirty, dangerous and difficult) and are generally labour-intensive and hazardous.¹⁰ We suggest OSHMP25 has an opportunity to strengthen and implement practical OSH provisions for foreign workers, while improving collaboration with relevant unions, associations and NGOs, to help meet the OSH needs of this significant part of the labour force.

The under-reporting of work-related injuries and illnesses are known national challenges and we believe it could be helpful to examine the use of self-reporting data-gathering systems, such as the inclusion of specific questions about OSH within ‘Labour Force Surveys’, in order to improve the reliability of national OSH data.¹¹ Such research could potentially be included in OSHMP25, Strategy 1, Programme 6. Collecting and analysing this type of data can help give an indication of the scale of under-reporting and once a fuller picture of OSH failure is established, performance trends can be better monitored and appropriate resourcing prioritised. In addition, it could also be helpful to disaggregate the overall occupational injury and disease data provided in the OSHMP25, so that attention and resources can be targeted.

Strategy 2: Strengthening of Self-Regulation Practice in Workplace (p.30)

We welcome inclusion of the reference to *ISO 45001:2018 Occupational Health and Safety Management Systems – Requirements with guidance for use*, which is an important resource for governments when developing public policy and for organisations managing OSH risks across their operations and supply chains. We suggest that ISO 45001, currently mentioned in Strategy 5, Programme 2, could also usefully be referenced both here and in Strategy 1 above, with OSHMP25 also promoting the benefits of leadership and worker participation for all workplaces. Also, given the growing global problem of modern slavery and human trafficking, OSHMP25 could emphasise the need for corporate due diligence and responsible supply chain management, both here and in Strategy 1 above.

Strategy 3: Encouraging OSH Education and Research (p.36)

IOSH suggests OSHMP25 could make reference to supporting UN SDG4 (lifelong learning) and further optimise opportunities for gathering and exchange of information on OSH, training courses and materials, appropriate technologies and the formulation and implementation of standards and guidelines, as follows.

- OSH competencies and capabilities – as OSH professionals and regulators increasingly need to broaden their skills, knowledge and behaviours, including managerial and business skills, in order to influence and drive change, IOSH offers its global competency framework.¹² This can provide alignment to a recognised structure and an enhanced professional journey, with a comprehensive suite of practical tools and training courses to guide skills and career development. Please see our resources section on page 7.
- ASEAN-OSHNET – Malaysia can update its entry to include its new OSHMP25 and its supporting strategies and programmes and share progress with its implementation with other network members.
- International Commission on Occupational Health (ICOH) – the OSHMP25 can highlight the involvement of Malaysian experts in this important international network, including the Malaysian Society of Occupational Health Doctors.
- World Health Organization (WHO) – DOSH could seek engagement with WHO on occupational health issues, in line with its Constitution (article 2),¹³ which focuses on promoting the improvement of working conditions and other aspects of environmental hygiene.
- ILO – Malaysia can continue to promote the Decent Work Country Programme (DWCP) Malaysia framework for cooperation between the ILO, the Government of Malaysia, the Malaysian Employers Federation, and the Malaysian Trades Union Congress, working to support Malaysia's plans and the UN SDGs, with particular focus on SDG8.
- AOSHRI – we suggest continued engagement with the AOSHRI network of OSH research institutes in Asia, to help facilitate international knowledge exchange as appropriate.

Strategy 4: Strengthening of Occupational Health (p.43)

IOSH highlights the need to emphasise the synergy between OSH and public health, and DOSH may consider building on its experience of working with public health authorities to ensure a complementary approach between public and occupational health and OSH policies in creating safer and healthier workplace environments.

It is reported that the epidemiological data for occupational diseases is scarce, especially among small and medium industry (SMI) workers.¹⁴ It has been recognised by DOSH that *'the under-reporting of occupational diseases and poisonings is an accepted problem in Malaysia, and there has been an effort under the current Master Plan to encourage employers – in consultation with OH practitioners – to report when they identify cases of occupational illness so that DOSH can investigate and take action as necessary.'*¹⁵ As well as our suggestion around the use of Labour Force Surveys for Strategy 1, we suggest this could also be further progressed through developing basic coverage of occupational health services for both the formal and informal workforce and through appropriate occupational health awareness-raising for employers, workers and medical professionals.

Occupational cancers are a major problem worldwide. Public authorities and national governments can improve awareness-raising in their citizens and employers by promoting information on occupational cancer prevention, such as IOSH's *No Time to Lose* campaign,¹⁶ which focuses on diesel engine exhaust emissions, solar radiation, silica dust and asbestos. We welcome the support of MOSHPA¹⁷ and suggest that OSHMP25 could consider including the urgent need for tailored approaches to prevent work-related cancer affecting blue-collar workers in low-profile occupational sectors (such as the rubber industry, industrial maintenance and agriculture) to help reduce the 'invisibility' of the issue and raise public perception.¹⁸

Work-related mental health is gaining much-needed attention and we suggest the new guidance standard ISO 45003 *Occupational health and safety management – Psychological health and safety at work: managing psychosocial risks – Guidelines*, due to be published in 2021, could usefully be signposted here.

Strategy 5: Extending OSH Practices in Small and Medium Enterprises (SMEs) Sector (p.51)

We note that about 65.3% of Malaysia's workforce works in SMEs and are conscious that efforts to raise awareness about occupational diseases and assistance for prevention need to overcome challenges. These include low accessibility to basic occupational health services, due to existing infrastructure issues and OSH system provision, which would benefit from attention.¹⁹

For smaller organisations the Strategy 5, Programme 2 text could also refer to a free publication for SMEs, entitled *The Little Book of Health and Safety Management for Small Businesses*, produced by BSI, Lloyds Register and the UK's Health and Safety Executive²⁰ and intended to support a systems-approach to OSH risk management in small businesses.

Strategy 6: Strengthening OSH Through Technology (p.59)

While there are many potential advantages from technology, there are also downsides and so use must be guided by responsible business conduct. There is increasing demand from the public and from civil society for better understanding of how the digitalisation of workplaces will affect workers' conditions and health and safety. As new technologies will be associated with new risks, these will need to be assessed properly before, during and after the implementation of an advancement to ensure that OSH is designed-in and achieved.

This strategy could promote a responsible adoption of technology developments with a human-in-command approach, addressing the OSH implications, including the psychosocial impacts of the human – technology interface, work intensification and also any potential reduction in physical fitness due to increased sedentary work and labour-saving technology.

Strategy 7: Improving OSH digital platform workers (p.65)

We suggest that OSHMP25 can promote the importance and benefits of providing the same level of care for the health, safety and wellbeing of non-permanent workers, as for permanent employees.

Editorial

- Page 44: typographical error – in Strategy 4 (Strengthening of occupational health) the opening sentence refers to there being 19 Sustainable Development Goals, whereas there are only 17 SDGs.
- Page 73: in the *Closing Vision Achievement – Prospectus* section on 'Expected reactions among stakeholders in the new health and safety system', we suggest the text on 'Employers' (p.73) is made clearer on their OSH role and responsibilities as leaders, decision-makers and risk managers, as it currently reads as though the safety representatives are expected to be fully responsible. We suggest this might be reworded as "*Employers are fully responsible for the safety and health management, as well as for publishing safety and health performance reports, bulletins, and the like on a regular basis as a dedicated form of social responsibility, and for actively involving safety representatives.*"

IOSH resources

- IOSH offers OSH [guidance](#), [e-training modules](#), [webinar recordings](#), [research reports](#) and [campaign materials](#), as well as our [Coronavirus hub](#).

- IOSH also offers a range of [OSH training](#) options to address stakeholder, employer and employee needs across organisations and sectors from boardroom to shopfloor, including [Leading Safely](#), [Managing Safely](#) and [Working Safely](#).
- IOSH has developed a unique OSH [competence framework](#) and materials for supporting OSH professional development, including our [Level 3 Certificate](#) in Safety and Health for Business.
- IOSH is pleased to partner with the International Social Security Association to co-develop the Vision Zero [training package](#) and manage the accreditation process for trainers.

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About IOSH

Founded in 1945, the Institution of Occupational Safety and Health (IOSH) is the largest body for health and safety professionals in the world, with around 47,000 members in over 130 countries, including over 13,000 Chartered Safety and Health Practitioners. Incorporated by Royal Charter, IOSH is a registered charity and an ILO international NGO.

The IOSH vision is **“A safe and healthy world of work”**

The Institution steers the profession, providing impartial, authoritative and free guidance. Regularly consulted by Government and other bodies, IOSH is the founding member to UK, European and International professional body networks. IOSH has an active research fund, helping develop the evidence-base for health and safety policy and practice. Summary and full reports are freely accessible from our website. We have also developed a unique UK resource providing free access to a health and safety research database, as well other free online tools and guides, including resources for business start-ups; an occupational health toolkit; and a coronavirus resource hub at www.iosh.com/coronavirus.

IOSH has 41 Branches worldwide, including in Hong Kong, Singapore, the Caribbean, Oman, Qatar, UAE, the Republic of Ireland and the Isle of Man, and a Division in West Africa. There are 18 special interest groups. These cover aviation and aerospace; broadcasting and telecommunications; construction; consultancy; education; environment and waste management; financial services; fire risk management; food and drink industries; hazardous industries; health and social care; logistics and retail; offshore; public services; railway; rural industries; sports grounds and events; and theatre.

IOSH members work at both strategic and operational levels across all employment sectors. IOSH-accredited trainers deliver health and safety awareness training to all levels

of the workforce, from shop-floor to managers and directors, through a professional training network of over 2,000 organisations. We issue around 180,000 certificates per year.

For more about IOSH, our members and our work, please visit our website at www.iosh.com. Our five-year strategy WORK 2022 can be viewed at www.ioshwork2022.com and our resources specifically tailored for business can be found here www.iosh.co.uk/ioshmeansbusiness.

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