



Promoting Occupational Safety and Health through the provision of

Microfinance, Micro-insurance and Banking Services

Background

The promotion of micro and small enterprises as a way of creating employment and incomes for large numbers of people is recognized as an important development strategy in Egypt as well as many other countries. While the provision of financial and non-financial services is succeeding in creating and expanding businesses the quality of work within many micro and small enterprises is far from ideal and in many instances unsafe or unhealthy. Poor quality workplaces can adversely affect the safety and health of both business owners and employees, negatively impact business performance and reduce the positive social impact that is generally expected by those who promote business growth as part of development programs.

As interest in promoting the positive social impacts of business promotion programs grows there are emerging experiences that are starting to demonstrate how business support programs can improve working conditions including occupational safety and health. Microfinance institutions can build on their positive relationships with business owners and improve workplace safety without jeopardizing best practice principles. Improved occupational health and safety can contribute to positive social impact and be assessed through the micro-finance rating process.

While programming in micro-insurance is still relatively new in Egypt the provision of micro-insurance can provide compensation for work related injuries when they occur and also help create an economic incentive for improving workplace safety as a way of reducing risk and the cost of insurance coverage whether at the level of individual businesses or an overall loan portfolio.

Under some circumstances conventional banking practices will distinguish between businesses that are safe and those that are unsafe although not from the perspective of workplace safety directly. A business that is known to be unsafe and prone to having to contend with unexpected expenses and disruptions in production due to accidents will be less creditworthy than a similar type of business that is considered to be safe. While the distinction by a bank will be based on credit risk the implication is that good occupational safety and health practices can contribute to credit worthiness. Canadian experience suggests that investment in safe and healthy workplaces is part of a profitable business strategy and that the promotion of safe work can be a win-win situation for businesses and workers.

Occupational safety and health is normally promoted through government regulation and inspection yet such programs have generally not be able to reach the many micro and small enterprises that are expected to create much of the future employment in Egypt. By building on the experiences that are now emerging through a variety of business support programs it will be possible to develop new and additional ways of improving occupational safety and health and positively affect larger numbers of business owners and employees.

The Workshop

The Canadian International Development Agency and the CIDA funded projects: Promoting and Protecting the Interests of Children who Work Project (PPIC-Work) and Business Development Services Support Project (BDSSP) decided to host an interactive workshop on the theme of Improving Workplace Safety and Health through the provision of financial services. The workshop benefited from the experiences of occupational safety and health specialists as well as national and international agencies involved in programming related to the provision of microfinance, micro insurance and banking services.

The workshop set out to:

- Review the variety of problems / challenges within micro and small enterprises (workplaces) with respect to occupational safety and health;
- Show links between occupational safety and health and the business / social development goals of financial service institutions;
- Provide for an exchange experiences that are leading to improved occupational safety and health (improved social impact) through the provision of microfinance, micro-insurance and conventional banking services;
- Facilitate the development of collaborative programs to improve occupational safety and health in micro and small enterprises through the formation of working groups (MF, MI, banking or informal, formal sector) and the development of collaborative action plans.

Structure and Overview of the Workshop

The workshop was structured to bring together individuals and agencies with experience in occupational safety and health along with those involved in microfinance, micro-insurance and conventional banking and to provide opportunities for formal presentations as well as interactive discussions using world café and panel review formats.



Occupational Safety and Health (OSH)

The workshop opened with a discussion of the types of occupational safety and health problems that are common in micro and small enterprises including gender

differentiated work hazards and the variety of challenges that have made it difficult to bring about positive change in these types of workplaces.

Microfinance

The discussion of microfinance experiences showed both how and why microfinance institutions are able to improve working conditions (including occupational safety and health) within their client businesses. The development of specifically designed intervention tools that are implemented as part of the lending process allow loan officers to work with business owners to create a decent work environment. The changes in



occupational safety and health contribute to the improved social impact of microfinance programs and this can be monitored and measured as part of social rating criteria and systems. Government agencies and socially responsible investors have the ability to use these ratings to channel resources to those microfinance institutions that have the most positive developmental impacts.

Micro-insurance

The presentations on micro-insurance drew on the results of a recent survey in Egypt that looked at the demand for various types of insurance and described the challenges in designing and delivering micro-insurance as a potential new growth area in Egypt. The development of accident insurance would be one of the easier types of micro-insurance products to develop and implement and could contribute to an improved social impact of microfinance programs by both compensating injured workers and encouraging safer work practices as a way of keeping insurance costs as low as possible.

Banking Services

Presentations from the banking sectors in Egypt and Canada set out the importance of addressing social, environmental and governance issues as part of long term sustainable growth strategies for banks themselves and this is turn will be influenced by the banks abilities to successfully support the micro – small – medium business sector. Lending decisions made by banks will be influenced in part by the ability of business owners to successfully mange the costs and risks



associated with occupational safety and health. Experience from the Canadian industrial accident prevention programs show that a health workplace strategy makes good business sense and investments in occupational safety and health improvements have positive impacts on business performance and the bottom line.

Interactive Discussions

Following the presentations workshop participants took part in a set of "world café" group discussions to review the ideas raised through the presentations and determine the types of opportunities that exist for improving occupational safety and health through the provision of microfinance, micro-insurance and banking services. The groups then identified the types of constraints that would need to be addressed and provided suggestions for moving forward.

The results of the group discussions were summarized at the end of the first day of the workshop and presented to participants at the beginning of the second day. Two specialist panels critiqued the suggestions that had come forward from the participants and provided further insights and recommendations for future work. Participants then joined one of three action-planning groups that looked for specific ways that new programming could be developed and implemented through microfinance, micro-insurance and the provision of banking services.

Workshop Presentations and Discussions

Promoting Occupational Safety and Health through the provision of Microfinance, Microinsurance and Banking Services

Occupational Safety and Health (OSH) Problems / Challenges in reaching micro, small enterprises and the potential for new approaches

- 1. Common OSH problems in small workshops (Specialist formerly with NIOSH)
- 2. Challenges to promoting OSH improvements where there is no regulatory pressure for change. (tools for making the business case) (ILO)
- 3. Gender Hazards and Work (Population Council)

Microfinance

- 4. PPIC-Work Interventions (PPIC-Work, EACID, PTE, MEDA)
- 5. Social Performance Management (AKDF)
- 6. Microfinance for Decent Work (ILO)
- 7. MF Rating and Indicators (PlaNet Rating)
- 8. Investment in MFI's and M/SME's SFD
- 9. Investing in MFI's Ethical Investment Funds

Micro-insurance

- 10. The potential of micro-insurance (ILO)
- 11. Micro-insurance study (PlaNet Finance)

Banking Services

- 12. Egyptian Banking Experiences
- 13. Canadian Banking Experiences (BDSSP)
- 14. Industrial Accident Prevention Business Support Programs (IAPA)

World Café

Opportunities (microfinance, micro-insurance and banking) Constraints Ways of overcoming constraints

Specialist Panels

Microfinance Micro-insurance and Banking

The workshop presentations are available through the PPIC-Work website at www.ppic-work.org under: resources / workshops / Workshop 3.

World Café Discussions

Following the presentations, workshop participants joined one of several group discussions and respond to a set of questions related to the workshop theme of improving occupational safety and health through the provision of microfinance, micro-insurance and banking services.



The questions addressed were:

- 1. What are the **opportunities** for the provision of microfinance, micro-insurance and banking services to improve occupational safety and health in micro and small enterprises?
- 2. What types of **constraints** would need to be overcome before the provision of microfinance, micro-insurance and banking services would be able to contribute to improved occupational safety and health within micro and small enterprises?
- 3. Given the opportunities and **constraints** what are practical ways of moving forward so that microfinance, micro-insurance and banking services can improve occupational safety and health in micro and small enterprises?

The world café format provided participants with an opportunity to discuss the first question around their table and then move to a new table. One participant (the table host) remained at the initial table and summarized the previous conversation to the newly arrived participants. By moving participants around the room the conversations at each table were cross-fertilized with ideas from other tables. Participants were asked to discuss the second and third questions and the results of the discussions reflected in the table hosts notes were compiled and presented to the plenary at the beginning of the second day of the workshop.

Rationale:

We need to be able to show why microfinance, micro-insurance and banking institutions should be interested in occupational safety and health.

Managing risk for microfinance, micro-insurance and banking institutions is very important for the business and understanding what potential

Improving OSH within a business can help you manage (reduce) risk (of injury, loss of productivity, default, ...)

Why should MF, MI, and BKS be interested in this?

Managing risk for all three groups is very important for their business, and understanding what potential OSH arise for clients can help them manage this risk.

Summary of World Café Group Discussions:

Question #1:

What are the **opportunities** for the provision of microfinance, micro-insurance and banking services to improve occupational safety and health in micro and small enterprises?

Microfinance	Micro Insurance	Banking Services
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Training and Planning

- MFI to set training programs for their staff to improve their ability to recognize and mitigate risks to better help SME owners
- MFIs to link with vocational training program that include OSH concepts and may already provide OSH services to clients
- MFIs to implement dual-purpose loans (or conditional loans for clients - may be dependent on non-financial conditions such as training)
- Expand the business feasibility study to include business improvement for OSH
- MFIs should collaborate with business development service (BDS) providers to provide OSH services to clients

Awareness

Organize open meetings and training programs for business owners to raise awareness about OSH

General

- Micro-insurance may be bundled with microcredit or provided individually and there are advantages and disadvantages with each approach. If micro-insurance is bundled then individual clients don't know how to make use of it and may not realize the value of insurance; if micro-insurance is provided individual basis then it can become a burden on the loan officer and the MFI in attempting to rate each company / business and determine the costs to be charged. There is a need to look at each type of mechanisms before deciding on an approach.
- Better to have specific packages for different stakeholders so that incentives can be developed and tailored to different target groups (can be individual enterprises or business sectors)

- Banks will have similar opportunities as MFIs in helping developing and implement micro-insurance products;
- Banks can / should adapt triple-bottom line approach (people-profit-planet)

- At client level look at successful interventions and document case studies
- At funder/donor level raise awareness
- At rating system operators level introduce criteria on OSH
- Introduce government regulated cofinancing for OSH
- Publicize evidence that OSH can benefit the business case (improve the bottom line)
- Get support of the socially responsible investors community
- MFI networks should advocate for policy change at the government level – a way to look forward

Rewards

- Set a rewarding system for best business owner on a monthly basis
- Introduce a step by step incentive system that will encourage work places to improve their OSH conditions and have a monitoring and evaluation system to decrease the premium on the insurance as the work place shows improvements on these conditions
- MF credit bureau should be set up in Egypt and provide social as well and financial information.

Question #2:

What types of **constraints** would need to be overcome before the provision of microfinance, micro-insurance and banking services would be able to contribute to improved occupational safety and health within micro and small enterprises?

Microfinance

- OSH may not be part of the organization culture for board and staff
- Negative competition amongst different MFI's (same area, same clients... etc.) if there were increased costs in delivering programming that improved OSH

Micro Insurance

- There is a lack of guidelines or standards in Egypt regarding the provision of microinsurance – at the moment only insurance companies can provide insurance
- No readily-designed product in the market for micro-insurance that targets micro and small enterprises

Banking Services

- The requirement for collateral blocks banks from targeting micro and small enterprises
- Banks don't get involved directly with nonfinancial services – generally banks do not have a social agenda

Constraints that apply collectively to microfinance, micro-insurance and banking services:

General

- Offering this kind of service increases costs and tasks at least to some extent
- Overburdening loan officers with more work may affect their efficiency
- NGO's, MFI's, or implementers become over-stretched (interested in taking more social activities)
- Some MFIs have experienced a drift in mission from social and financial to only financial
- Promoting OSH may have negative affects on sustainability a challenge for institutions and clients
- Monitoring a challenge (how do you measure progress or success in OSH?)
- Who would offer these services (core staff, additional staff, partners...etc.)
- Policy a big question mark (making it work for you) Governmental regulations that may stop MFI's from providing services other than micro lending
- The relationship of loan officer with the business owner has to be on a business level there needs to be more of a capacity to make a business case as to why the promotion of OSH is good for the business
- There are few social investors and little experience of this type of investment in Egypt
- Currency fluctuation risks can affect the ability of MFIs to get access to new funding from socially oriented investors
- Most clients are from the informal sector (therefore lack of government regulation for businesses)

• There is a general lack of skill professionals in OSH

Culture

- Literacy and numeracy levels barriers on the client side (as well as many aspects of the whole culture)
- Changing people's habits (people believe in faith or God's protection to help them avoid work-related accidents)

Awareness

- Low awareness at the business owner level and and at the board level of MFI's regarding the benefits of OSH
- Social rating is not yet part of the donor's awareness (therefore not important for MFI's to follow)
- Lack of data disseminated to the public regarding micro-insurance
- Lack of asset managers (within socially responsible investment programs) that are aware of the work of MFI's

Question #3

Given the opportunities and constraints what are practical **ways of moving forward** so that microfinance, micro-insurance and banking services can improve occupational safety and health in micro and small enterprises?

Microfinance

Sharing and Rewarding

- Bringing together clients from similar industries or sectors that can learn from each other (point out those that are doing things the right way)
- Active role in MFI networking to attract social investors
- Using positive model from MFIs to make a convincing business case
- Incentive systems should include rating indicators

Ideas Adopted

- Introducing the culture of OSH into the MFI starting from management to midmanagement to staff (is training enough to accomplish this?)
- Raising donor awareness about the importance of integrating social rating indicators

Micro Insurance

A New Idea

- New market not many players in Egypt yet, nothing that's right or WRONG (go first – cash in later)
- Design new insurance products to fit the needs of micro and small enterprises
- Initiatives or roles from government to establish insurance for micro and small enterprises to enhance OSH
- There is a need to have more available data and information about micro-insurance programs

Banking Services

Build on new banking initiatives

Adapt / apply the triple bottom line approach:
people, planet, profit (Equator Principles)

 $Ways \ forward \ that \ apply \ collectively \ to \ microfinance, micro-insurance \ and \ banking \ services:$

Awareness

- Potential media/opportunities that can be used to raise awareness?
- CIDA chairs a donor sub-committee in Egypt could place OSH awareness on the agenda
- Innovative learning techniques (photos, peer-learning, non linguistic methods sharing a lot of information or successes at the client level)
- Asset managers' unawareness investors are aware and therefore should request their asset managers to offer micro finance investment opportunities
- Socially responsible investors should have meetings amongst themselves (introducing awareness at different levels)
- Organizations to link with government institutions to promote OSH
- Safety Champion" –in a small group of businesses or a large business

Training

- Lack of experts organizations and training centers should build the capacities of MFI's and trainees on OSH and share expertise between groups (trained as well as non-trained introduce a community of practice)
- MFI networks to provide training for MFI's on OSH and acknowledge best performance with awards

Others

- Develop a monitoring system to measure OSH performance and tie this to the credit screening process and the credit bureau and eventually to MFI rating and access to social responsible investment funds
- Currency risk government to absorb some of this risk to encourage investment in MFI's

Panel Critiques

Following the presentation of the summarized information from the world café discussions two expert panels reviewed the results and provided further insights in the types of challenges that would need to be addressed and ways that these might be addressed in future programs that would promote occupational safety and health through the provision of microfinance, micro-insurance and banking services.

Panel 1 - Microfinance

The first panel focused on microfinance and included representatives from microfinance practitioners (Egyptian Association for Community Initiatives and Development and First Microfinance from Egypt and Tamweelcom from Jordan), the regional microfinance network (Sanabel), and a leading microfinance support agency (PlaNet Finance).



Summary of Discussions

The promotion of occupational safety and health can be integrated into normal microfinance programming and should not be subsidized at the level of clients as this will allow MFIs to eventually reach large numbers of clients, businesses and workers. It will however be important for MFIs to make the business case clear for business owners that good OSH standards can help improve overall business performance and profitability. The documentation and dissemination of successful cases studies could contribute to increased awareness about the business case for OSH.

Senior management and boards of MFIs need to be supportive of including the promotion of OSH as part of social impact programming. The ability of MFIs to develop innovative programs that improve social impact will help them become market leaders in their areas of operation and attract the interest of international donors. The Social Finance program of the ILO is one collaborative programming mechanism that is assisting MFIs improve the social impact of their programs

Some subsidy may be required to provide training for microfinance staff so that they are able to create awareness about the importance and value of OSH among business owners and provide practical advice on how to improve OSH within client businesses. Additional subsidies may also be needed to create awareness about OSH problems and to promote the concept of improving OSH within microfinance programming. Training for MFIs in the past has often been initially subsidized when new topics are introduced (such as social performance management) but training can later be provided on a cost recovery basis once there is sufficient interest among MFIs. The MFIs from Egypt and Jordan that have already started to include the promotion of OSH within their programs have found the costs of training their staff to be relatively inexpensive.

MFIs will have to ensure that they are able to sustain the programs they undertake to improve their social impact as well as sustaining their normal financial operations. When introducing new socially oriented programs MFIs will need to consult with all stakeholders in their areas of operation and make sure that the new programming they undertake will provide them with a competitive advantage.

Expanding OSH programming among MFIs will be limited to those organizations that are already financially sustainable. Of the 75 MFIs that are members of the Sanabel regional microfinance network (these MFIs serve 80% of the regional microfinance market) there are about 30 who would be ready to undertake socially oriented programming that could include the promotion of OSH. While there had been a time when MFIs were discouraged from undertaking social programming this is no longer the case and it is now the stronger MFIs that are performing well in terms of social impact and financial sustainability.

As socially oriented programming becomes more widespread MFIs and MFI rating agencies will need to develop consistent ways of measuring and monitoring social impacts. This will include the development of appropriate indicators for improvements achieved in OSH standards.

The new legislation governing microfinance programming in Egypt will result in three types of microfinance service providers: NGO's that provide only microfinance services, NGO's that provide microfinance services along side other socially oriented programming and private companies that provide microfinance services.

There is a growing body of socially responsible investors who are starting to recognize microfinance as a viable investment opportunity. The ability of MFIs to

demonstrate the positive social impacts of their programs and to have these impacts validated through independent rating agencies will assist MFIs in connecting with socially responsible investors. Microfinance networks may be able to help facilitate this process.

Panel 2a - Micro-insurance

The second panel focused on the provision of micro-insurance and banking services and included representatives of micro-insurance support programs and agencies involved in studying the micro-insurance market in Egypt (ILO Micro-insurance Innovation Facility, PlaNet Finance) and those involved in working with the Egyptian and Canadian banking sectors (Business Development Support Services Project - CIDA).



Summary of Discussions

MFIs will be able to complete there existing microfinance products through the introduction of micro-insurance as part of product diversification. This can be done through partnerships with existing insurance companies that build on MFIs' outreach and efficiency in managing large numbers of small loans.

The provision of micro-insurance does involve some costs and these can be passed on to individual clients or included in the MFI interest rate or fee structure. The value of insurance is not always well understood as most of clients do not make claims and therefore do directly see the benefits of insurance.

Micro-insurance can be reactive in providing financial support after an event has occurred but it can also be proactive in helping prevent events such as accidents or injuries occurring and therefore have an impact on OSH in part because a safer work environment can mean that the cost of insurance premiums will be less. The ability to reduce premium costs provides a financial incentive for business owners to maintain a safe and healthy workplace.

Accidents in the workplace hurt both the worker who is injured and the business that faces production disruptions that may involved the recruitment and training of new or temporary staff. While accident insurance can compensate the worker it does fully offset the business losses that are associated with the occurrence of accidents.

A new micro-insurance product based on disability insurance is being developed for Egypt (PlaNet Finance, FMF, Allianz Egypt). Other MFIs make use of group solidarity funds and these may be converted into micro-insurance programs in future. There are four types of insurance that are being considered for introduction in Egypt: disability, hospitalization, funeral and education insurance.

Panel 2b - Banking Services

The Egyptian Banking Institute provides training and support services for the banking sector in Egypt. It has established a small and medium enterprise (SME) unit that encourages banks to recognize the market represented by SMEs. There are currently more than 20 Egyptian banks working with SMEs. In some instances banks that have been already active in microfinance up-scaling these programs to serve SMEs while in other cases banks are down-scaling their conventional programs to include SMEs. In one instance the minimum business loan size was reduced from 5 to 1 million Egyptian pounds.

While Egyptian banks are beginning to work with SMEs they are still in the process of determining whether this type of lending will be profitable and viable over the long term. This will mean that it will take some time before banks will be ready to promote OSH or other types of social development objectives. In some instances banks may see the promotion of OSH with their SME clients as part of good public relations.

In the Canadian banking system banks require that businesses be in compliance with the law including occupational health and safety legislation. Employers must register with the provincial Workers' Compensation Board and pay Workers' Compensation insurance premiums based on the industry classification. This insurance covers any medical costs incurred by workers in the event that they are injured at work. The cost of the insurance varies and workplaces that are considered to be more hazardous are charged higher insurance rates. While rates are determined primarily by business sector a business with a poor safety record

may be charged a high insurance premium and there is therefore a direct financial incentive to create a safe work environment.

In the Canadian context the costs of a typical industrial accident are 20% direct (related to the costs of compensation for the worker) and 80% indirect (loss of business productivity and profitability).

In the Egyptian banking system OSH may be promoted as a win / win situation where the creation of a safe work environment within the business will reduce the risk of disruptions in production and related business costs. This will have the effect of reducing the credit risk for the business.

The development of training programs and materials that can be provided for both bankers (through EBI) and business owners (through bank staff) should be developed to help create an awareness of the value in promoting OSH from a business and banking perspective. Improve OSH can help businesses become more productive and profitable and improve their credit worthiness.

It will be important to document case studies that show how improvements in OSH have contributed to business performance and to incorporate these case studies into the training programs.

Access to future loans for business owners of SMEs can be conditioned on attendance at an OSH training program.

Working Group Presentation (Flip Charts)

Participants joined one of three groups to work on specific action plans that they would be able to help implement. There was a particular emphasis on developing collaborative programming. Groups 1 and 2 focused on improving OSH through microfinance and Group 3 focused on improving OSH through the provision of micro-insurance and banking services.

The compilation of the working group action plans appear below:

Group 1

1. Communications:

Raise awareness among business clients as well as donors and investors

Actions:

- Document client stories
- Record OSH information along with regular financial data
- Network at MF and OSH events
- Make use of peer to peer sharing / learning

2. Lobby Networks and Platforms:

- Include OSH in SPM (Social Performance Management)
- Try to get OSH included as a topic at the SPM taskforce annual meeting

3. Offer Incentives to Clients:

- Eg loyalty cards, preferential rates for training programs, targeted products
- Add OSH to MFI incentive system for staff (loan officers)

4. Encourage Market (on investors side) to Develop:

 For investors who are interested in MFs ... there are not enough assest managers with knowledge about the MF industry; while this will improve over time MFIs will be able to help by preparing / disseminating information on their programs

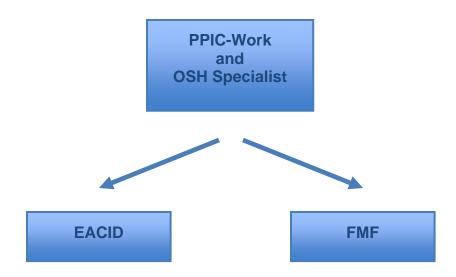
5. Assess Internal Support

For MFIs that are interested in promoting OSH it will be important to assess the level of support that is available through:

- Board of directors
- Senior management
- Loan Officers (have loan officers been trained? do they have any experience? Is OSH incorporated into their incentive system)

Group 2 Demonstrating Working Models for OSH and Micro Insurance *Making the Business Case*

Models will be based on business sector, business size and geographic location.



Intervene at MFI and client (business owner) levels

Potential Actors and Tools

- 1. Sanabel: Knowledge dissemination
- 2. IAPA: Tools available
- 3. Knowledge dissemination through network
- 4. Development of FS and evidence-based models that can be implemented and replicated
- 5. BDSSP to introduce OSH to the Egyptian Banking Institute (EBI) so that they can incorporate this into their training programs as part of risk management (improved OSH can help businesses reduce the risk of accidents / injuries leading to unforeseen costs and subsequent repayment problems)
- 6. EBI to follow up on OSH training and establish a monitoring program with indicators as part of the risk management process carried out by banks.

Over the long term there will be an affect on credit decisions by banks and on loan performance.

7. Introduce OSH Concept and Measurements to banks that lend to MFI's (make sure that this is not against policy)



Commercial banks, policy makers and other stakeholders should be consulted.

Action / Lead: SME Unit at EBI

Egyptian Supervisory Authority

Group 3 Future Work Plans

- 1. Organizing training courses that will provide the work team with information regarding OSH that they will in turn to transfer to the business owners.
- 2. Using posters for awareness and guidance.
- 3. Broadcasting enthusiasm amongst business owners: use business owners practicing OSH in transferring the experience they've gained from using OSH to other business owners what benefits did they receive in return?
- 4. Using dual purpose loans for resolving problems that the business owners face.
- 5. Negotiating with some insurance companies for creating a new product that would cover OSH and suit the conditions of small businesses.
- 6. Attempting to create a social role for banks and insurance companies through meetings, discussions, and coordination.
- 7. Activating the role of working youth in collecting information regarding problems faced as well as positive models within their work places, and documenting this collected information into a database that's available to all organizations.
- 8. Developing and granting insurance privileges to clients that have applied new OSH concepts not previously used in their work places (ex: increase their loan amount).
- 9. Adding OSH related training as part of the courses provided by vocational training programs.