

CITIZENS' LABOR RIGHTS PROTECTION LEAGUE

N.Narimanov street, 11 \ 16, Baku AZ1006, Azerbaijan

**INTERNATIONAL COVENANT ON ECONOMIC,
SOCIAL AND CULTURAL RIGHTS**

**ANNEX TO THE ALTERNATIVE REPORT SUBMITTED BY THE CITIZENS'
LABOR RIGHTS PROTECTION LEAGUE DUE TO THE 3RD PERIODIC REPORT
OF THE REPUBLIC OF AZERBAIJAN SUBMITTED TO UN COMMITTEE ON
ECONOMIC, SOCIAL AND CULTURAL RIGHTS**

The Citizens' Labor Rights Protection League submitted Alternative report to the 3rd periodic report of the Republic of Azerbaijan which was submitted to the UN Committee On Economic, Social And Cultural Rights. The report was posted on the Committee's website.

http://www2.ohchr.org/english/bodies/cescr/docs/ngos/CLRPL_Azerbaijan_CESCRWG49.pdf

Submitted Annex was prepared on the part of the questions related with Article 7 of the Covenant which were sent (June 7, 2012) to the Government of Azerbaijan by the Committee.

1. Developments in the field of labor protection

According to the Article 35 of the Constitution of the Republic of Azerbaijan “Everyone has a right to work in safe and healthy conditions,..”. According to the Article 215 of the Labour Code “The owner and employer of the establishment shall be directly responsible for the occupational safety of employees in the workplace and for the application of regulations.” According to the item c) of these Code “if an occupational accident happens as a result of an employer's failure to provide the necessary conditions in the workplace and the employee's health and welfare are damaged during the performance of his job, or if he/she dies as a result of the employer's negligence as a result of which his family members and their dependent suffer financial damage” an employer shall bear full financial liability.

Until January 2011, the employers paid compensation for the damage caused to the employee's health as a result of occupational accidents and occupational diseases at the expense of the establishment. Although the employer had a right to insure such kind of his/her responsibility to the employee, the right was rarely used and there was no legislative framework concerning such insurance (only general regulations of life insurance could be applied).

"The Law of the Republic of Azerbaijan on Compulsory insurance against occupational disability resulting from occupational accidents and diseases” adopted on May 11, 2010 and enforced from January 1 2011, as well as number of legal acts adopted with a view of exercising of the law made application of Compulsory insurance against occupational accidents and diseases mandatory. According to the law, all the employers should provide compulsory insurance to all employees involved at hired labour against occupational accidents and diseases.

Article 225 of the Labour Code was amended in connection with the application of the law. According the Article “1. Employers shall provide compulsory insurance to employees against occupational disability resulting from occupational accidents and diseases, pursuant to the law. Corresponding information on insurance coverage shall be obligatorily stated in the employment contracts.

2. Relations regarding compulsory insurance against occupational disability resulting from occupational accidents and diseases are regulated according to the relevant legislation”.

So insurance of responsibility of an employer regarding damage caused to the health of an employee became mandatory by adoption of "**The Law of the Republic of Azerbaijan on Compulsory insurance against occupational disability resulting from occupational accidents and diseases**".

2. The purpose of compulsory insurance

The main purpose of compulsory insurance is to protect the interests of employees and other beneficiaries, besides of being a measure aimed at compensation of damage occurred as a result of temporary or continuous loss of working ability resulting from occupational accidents and diseases. In case of death of employee as a result of occupational damage and diseases the compensation shall be paid to the dependants of an employer (in cases provided by law). Other purpose of compulsory insurance is to attract the interest of insurance companies to the exercising requirements of labour protection in workplaces. Insurance company indirectly controls implementation of rules of occupational health and safety technique which contributes to the creation of just and favorable working conditions.

According to the “Rules of categorization of employees having compulsory insurance coverage against occupational disability resulting from occupational accident and disease by the nature of their labour functions” approved by the Decision No.192 of the Cabinet of Ministries of the Republic of Azerbaijan, dated October 29, 2010, employees having compulsory insurance coverage against occupational disability resulting from occupational accident and disease are categorized by the nature of their labour functions as follows:

- Workers – employees directly engaged in production (commodity), service implementation, as well as repair, carrying freight, cleaning, maintenance, security and other activity types of such nature;
- Servants - employees engaged in implementation of works and services related to the administrators, specialists and technical executors;
- Managers – director and his/her deputies, as well as specialists of an establishment and any of its departments;
- Specialists - employees fulfilling labour functions on position of technical engineer, economist, lawyer, sociologist and other such positions; public servants who hold administrative positions in the civil service;
- Technical executors – filers, secretaries, timekeepers, copyists, archives staff, agents and other employees engaged in preparation and formalization of documents; public servants who hold position of assistant in the civil service.

3. Outcomes of law application

3.1. National employment rate

Employment rate of Azerbaijan increased up to 50,000 people from April 2011 to the same period of 2012 and reached to 4 282 600 people¹.

The number of economically active population increased for 25.9% for January 1, 2011 in comparison with 1995, for 6.7% over the 2006 and reached to 4587.4 thousand people, the number of employed people increased respectively for 19.8% and 8% and reached to 4329.1 thousand people².

However, according to the official data of the State Statistical Committee the number of wage employees by economic activity types was 1382900 people in 2010. According to the official data of the Statistical Committee the number of employees increased for 50,000 people from April 2011 to April 2012.

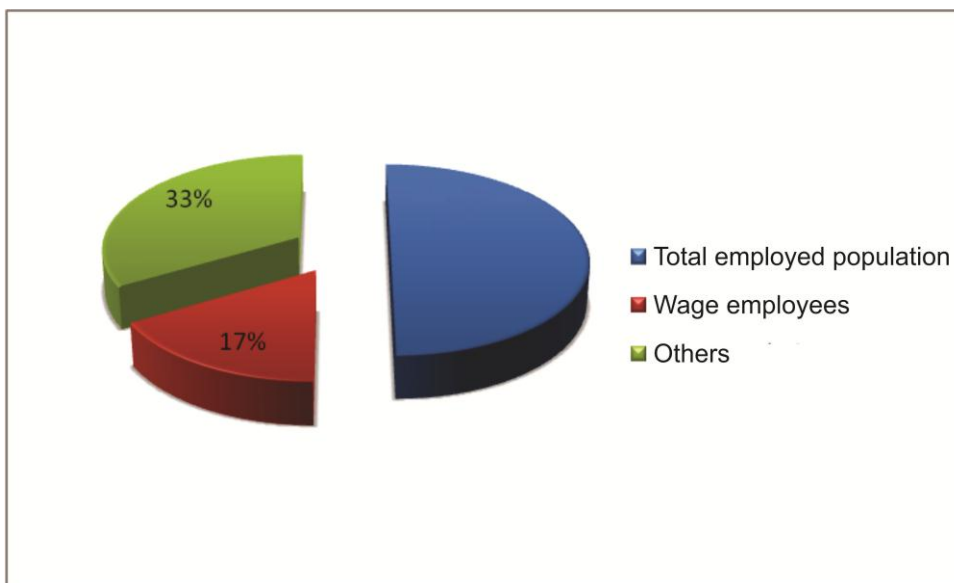
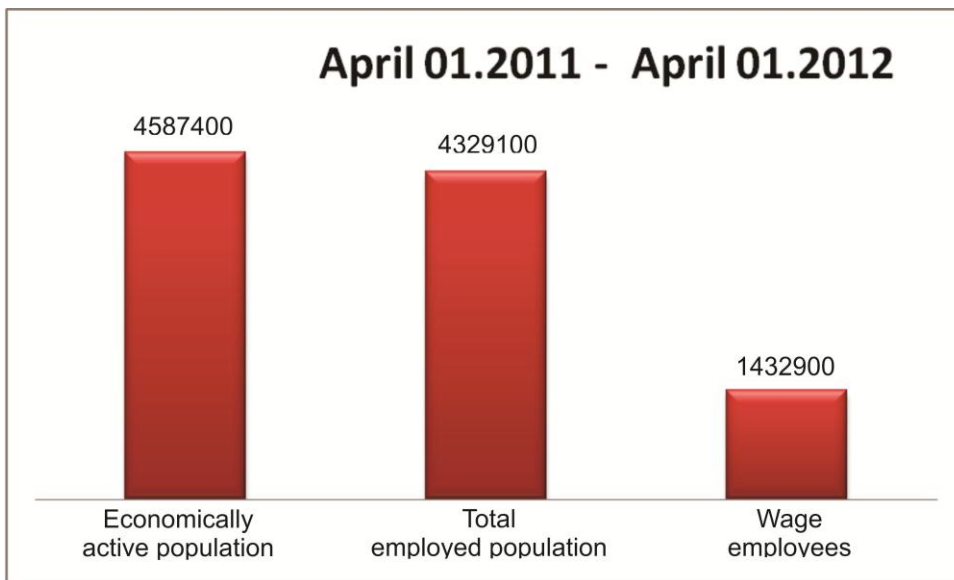
Thus, it is possible to determine by comparing the figures that the total number of people employed in the formal labor sector differs significantly from the indicators of total employed people. If to accept the number of people employed in the formal labor sector as 1432900 people, then the difference will be 2896200 people.

Some of these people are engaged in individual entrepreneurship, work on the basis of civil law contracts, and are participants of informal labour market.

So the statistics indicates that 70% of total employed population is participants of informal and shadow labor market or works on the basis of civil law contracts even if they are engaged in wage labour. Thus, this means that they have not been insured against occupational accident and occupational disease or that they have not any social insurance coverage.

¹ Source: <http://vergil.az/art-view/527/>

² State Program on implementation of employment strategy of the Republic of Azerbaijan in 2011-2015
Source: http://www.mlsp.gov.az/?id=5&sub_id=30&lang=1&dpid=68



3.2. Indicators of formal labour sector

The application of the system of compulsory insurance against occupational accidents and occupational disease is a positive process aimed at ensuring the right of employees to work in safe labour condition. The analysis of the situation existing before the application of the law shows that there were numerous problems related to payment of compensation by employers for the damage caused to employee's health. The problems were consisted of the followings:

1. The employers were not interested in payment of compensation for the damage caused to the employee's health and therefore evaded from the payment by using different means and ways;
2. In many of cases the establishment where the employee got injured or acquired occupational disease was later closed, changed organizational legal form or the owner. In such cases the employee who lost his/her labor ability or health wholly or partly as a result of occupational accident or occupational disease couldn't get defined compensation at all, or could not get the compensation fully or could get the compensation with difficulties. In cases of employee's death as a result of above mentioned reasons his/her dependants also couldn't get defined compensation at all, or could not get the compensation fully or could get the compensation with difficulties;

3. In many of workplaces the number of employees getting compensation for the occupational injuries or occupational diseases was extremely high and the establishment faced difficulties in payment of compensations even if they worked profitably. Therefore these establishments required higher fees for the implemented works and delivered services which caused reduction of the competitiveness of these establishments;

4. Payment of compensations by an employer had a negative impact on establishment's revenues which indirectly did not allow raising salaries, social payments and etc.

However, the application of the system of compulsory insurance against occupational accidents and occupational disease solve all these problems.

However, during the period of application of law the indicators of involvement of employees to the compulsory insurance by the formal labor sector have not reached desired level. Compulsory insurance is carried out by the insurance companies.

Contract on compulsory insurance could be concluded by the insurance company with life insurance license and with authorization by the Insurance Supervision Service for implementation of activity on compulsory insurance covered by this law.

Overall quantitative indicators of employees involved to the compulsory insurance are summarized, and classified by the economic activity types by the State Insurance Supervision Service under the Ministry of Finance.

According to the statistical data prepared by the Service, in the first year (2011) of application of compulsory insurance system, overall indicators by the formal labor sector was as follows:

Overall indicators

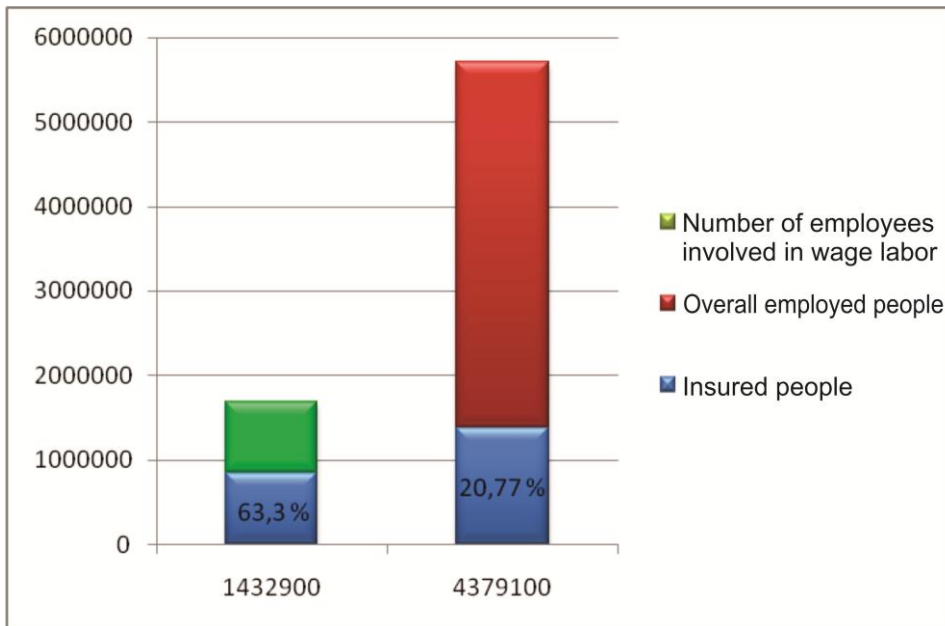
Periods	Number of people with insurance coverage		
	Total	Number of insured servant staff	Number of insured worker staff
2011	842 599	468 645	373 949

The ratio of this figure to the number of overall employed population (according to 2010 statistics the number of overall employed people was 4 329 100 people) is 19.46 %, and to the total number of wage employees (according to 2010 statistics 1382900 people) is 60.9 %.

Although there were observed growth trends in the number of insured people during 6 months of 2012, the figure cannot completely cover the formal labor sector. According to the data of the Service the indicators for 6 months of 2012 were as follows:

Periods	Number of people with insurance coverage		
	Total	Number of insured servant staff	Number of insured worker staff
For 6 months of 2012	909 554	505 877	403 679

The ratio of this figure to the number of total employed people (taking into account 50,000 new jobs created within previous year the number of overall employed people was 4 379 100 people) is 20.77%, to the total number of wage employees (1 432 900 people) is 63.3%.



The indicators of distribution of people involved in compulsory insurance by the economic activity types and by the risk groups are very interesting as well. The table below illustrates the indicators by a group of major economic activity types for 6 months of 2012.

Table

6 months of 2012	Education	Social services	Trade
Number of people involved in compulsory insurance	107 421	44 631	271 114

Such differences become more visible if to compare indicators by some of economic activity types which were shown as a sample and the official data of the State Statistical Committee. For example, according to indicators of 2011, totally 15 286 people was involved in compulsory insurance in the field of building construction – 3540 people on a servant position, 11 746 people on a worker position. According to the data of the State Statistical Committee for the end of 2010, the number of employees working in construction sector was 79 600 people. Even if to consider that construction is consisted not only of building construction, it is well known that the number of people working in other fields of construction is much less than the number of people working in building construction (residential and non-residential construction). The other sample could be education sector. According to the indicators of 2011, 190 427 servants, 29 941 workers were involved in compulsory insurance in education sector (in total 220 368). However, according to the data of the State Statistical Committee for the end of 2010, the number of people working in education sector was 345 300 people. Thus, at least 124 932 education staff has not been involved in compulsory insurance in 2011. In comparison with the indicators of 6 months of 2012, the figure will reach up to 107 421 people (if to accept the number of education staff as in 2010).

Public administration and defense; although the total number of people employed in the field of social services was 52 400 people in 2010, the number of people involved in compulsory insurance was 41 345 people in 2011, and 44 631 people for 6 months of 2012.

According to the data of the State Statistical Committee prepared for 2010 on “The Number of Wage Employees by Types of Economic activity”, the number of people working in trade sector was 286 800 people. According to indicators for 6 months of 2012, the total number of servants and workers having compulsory insurance coverage is 15686 people by this sector.

Such comparisons could be continued. However, similar situation is observed almost in all other types of economic activity. The indicators for compulsory insurance concerning employees of state-funded organizations, state bodies are respectively higher.

3.3. Indicators for payments

According to Article 16 of “The Law of the Republic of Azerbaijan on Compulsory insurance against occupational disability resulting from occupational accidents and diseases”, an employee who lost his/her labour ability wholly or partly as a result of occupational accident or occupational disease or if the employee dies because of these reasons, the types of insurance payments stated below shall be paid to other beneficiaries:

- Monthly insurance payment;
- Lump sum insurance payment;
- Additional insurance payment.

In case of occurrence of insurance event the payments shall be paid in the following order:

- Monthly insurance payment - is a monetary compensation paid in case of an insurance event to the beneficiary in lieu of monthly wage which was lost due to occupational disability.
- Lump sum insurance payment - is lump sum payment of total amount of monthly insurance payment in order provided by law. Lump sum insurance payment is paid in the cases given below:
 - in cases when a disability is assigned to the employee damaged as a result an insurance event and who have an insurance coverage, without appointment of date for the next examination;
 - in cases when insured employee dies as a result of insurance event.
- Additional insurance payment - is a monetary compensation presented to the insured employee damaged as a result of an insurance event for payment of costs for treatment, additional nutrition, purchase of medicines, making prosthesis appliance, care service, sanatorium-resort treatment, and purchase of special vehicle means and for expenses spent for training for another profession. Such payments are presented only after definition of an insurance event and after implementation of processes stipulated by the law.

According to law an insurance event is defined based on the followings:

Act prepared in a form provided by the law on occupational accident, court decision on the occurrence of occupational accident related to a person for benefit of whom have to be concluded contract on compulsory insurance;

Decision of the relevant executive authority approving the level of occupational disability of insured person occurred as a result of occupational accident or occupational disease, death certificate of the person.

One of the advantages of application of this law is existence of additional party interested in comply with the rules of labour protection in workplaces – insurance company which realize life insurance.

Insurance payments on occupational accident or occupational disease are being paid from the date of application of the law. The payments are paid only on the occupational accidents or occupational diseases occurred after the date of enforcement of the law.

The amount of insurance payments was 267 384.77 AZN in 2011, and 212 148.35 AZN for the 6 months of 2012.

5. General analysis of the situation within informal labour sector

According to the Article 3.1.1 of the “The Law of the Republic of Azerbaijan on Compulsory insurance against occupational disability resulting from occupational accidents and diseases” persons having compulsory insurance coverage are “persons fulfilling labour functions based on civil law contract or labour agreement concluded in line with law with legal entity or with physical entity engaged in entrepreneurship activity not forming a legal entity.

It means that not all participants of informal labour sector are insured against occupational accident or occupational disease. If to look at the above figures, it's possible to determine that the number of employees actually engaged in labour activity without compulsory insurance coverage is too high.

Above, we get familiar with the indicators of insurance in the formal labor sector. Although there were observed growth trends by years in this sector, the coverage was not provided.

The situation is more complicated in the informal labour sector. It is impossible to insure an employee if labour relations are informal. Nevertheless it does not exempt an employer from the responsibility to involve an employee to compulsory insurance. As mentioned above an employer bears financial responsibility to an employee with whom he/she has actual labour relation for the damage caused to his/her health.

According to the Article 7.3 of “The Law of the Republic of Azerbaijan on Compulsory insurance against occupational disability resulting from occupational accidents and diseases”, “If the insurer who bears statutory obligation to insure do not execute this obligation or if insurer concludes the insurance contract with conditions which cause worsening the state of insured person compared to the conditions stipulated by the legislation, in case of occurrence of insurance event he/she bears financial responsibility at least in amount of insurance coverage stipulated by the law to the person in favor of whom he/she had to conclude insurance contract in accordance with law”.

But there raises a number of serious problems in case of occurrence occupational accident or occupational disease concerning a person involved to hired labour without conclusion a labour agreement, as well as concerning a person who gets wage informally. These are followings:

- if there exist such case, it means that an employee was not insured and financial responsibility falls on employer;
- Due to the absence of formal labour relations, employers state that they do not have labour relation with an employee and avoid making payment voluntarily;
- A person (or his/her dependents) whose health was damaged have to prove several cases while appealing to the court. First he/she has to prove that he/she works in that establishment, an amount of his/her salary, and the fact that occupational accident and disease was occurred in the mentioned establishment.

As it is seen it requires passing through quite complex processes. The practices of courts show that these kinds of cases are rarely resolved in favor of a person whose health was damaged or his/her dependents. Even if the cases are resolved in favor of employee, i.e. if court put on employer an obligation to pay compensation for the damage, employee or his/her dependents cannot get these amount. The major reason is that such kind of establishments are created temporarily (for instance – Ltd created for construction of a building), the state of bankruptcy and artificial bankruptcy prevents the payment of compensation for damage. Such cases are widely spread in the country.

6. Double (black) accounting system and the problem related to compulsory insurance coverage of employees

In case of insurance event monthly, lump sum compensations are paid to employee or other beneficiary according to average monthly salary and commensurate to lost occupational skills of employee. In case of full loss of occupational skills an amount of compensation shall be

commensurate to average salary. Therefore the salary is the main factor for employee insured against occupational accidents and occupational disease.

The main problem observed before the transmission to the compulsory insurance system was informal labour relation between employer and employee whose health was damaged, and the other problem was the difference between actual salary and formal salary of employee. It should be regretfully noted that application of this system didn't solve these problems. Currently compulsory insurance do not cover employees without labor agreement (or civil-law agreement). The situation is different in the establishments keeping double (black) accounting. Thus, compulsory insurance of employees in establishments where exist big differences between actual salary and formal salary is carried out according to the formal salary. Of course, in case of social insurance event all the insurance payments are also paid according to formal salary. For example, if formal salary of employee is 100 AZN and actual salary is 500 AZN, in case of insurance event an amount of payments will be calculated according to formal salary and commensurate to his/her lost occupational skills.

Existence of such situation is one of the major problems in application of compulsory insurance system. During the period before the transition to compulsory insurance system an employee had an opportunity to define his/her actual salary by the court. However it was not so easy to realize it in practice. Anyway this right was existed and there were cases of use of this right. At present there is no any prospect in applying to the court. Since insurance company does not bear any responsibility for the payment of salary according to double accounting.

7. Main groups beyond the compulsory insurance

Gaps in legislation and shortcomings in the practical application of the law cause many people engaged in labour activity to be behind the compulsory insurance against the occupational accident and occupational disease. These groups include the followings:

- Employees exempt from compulsory insurance because of irresponsibility and negligence of employers despite the fact that they work in the formal labor market. Looking at above figures, it comes clear that despite the absence of problems from legal point of view employers acting irresponsible had not provided insurance coverage to employees. Such cases have wide scope even in budget organization and state bodies;
- All the employees working in informal labour sector. This includes mainly followings:
 - Domestic servants (baby sitters, cooks, personal drivers, gardeners, bodyguards and others domestic servants);
 - Employees working in catering sector (restaurants, restaurants for wedding reception, tea houses, clubs, etc.);
 - Employees working in trade sector;
- Peasant farmers;
- Land owners and for this reason considered able-bodied according to the Law on Employment;
- Persons who is not considered to be involved to compulsory insurance in accordance to the legislation.

8. Reasons preventing application of law on compulsory insurance

- **Existence of informal labour sector**

Existence of informal labour sector prevents provision of ten thousands of people actually engaged in wage labour with compulsory insurance coverage against occupational accident and occupational disease. The practice shows that the majority of people damaged as a result of occupational accidents are those who have not concluded labour contract.
- **Double accounting**

As stated above, compulsory insurance of employees in establishments with double accounting system is carried out according to the formal salary. In such case, an employee or other beneficiaries cannot get compensation in case of insurance event.

Lack of sufficient corporate social responsibility of employer to employees

Corporate social responsibility of employer to the society and staff is very low in the country. Therefore many employers do not insure employees against occupational accidents and occupational disease avoiding supervision. Employers' failure to ensure taking necessary measures for application of rules of occupational health and safety techniques, as well as to insure employees are the major factors preventing application of the law.

- **Problems related to the provision of control over the execution of the law**

Provision of control over the execution of the law is very difficult. Currently control system of inspection agencies in establishments is carried out based on unified register. The State Labour Inspectorate Service carries out inspections in establishments only after pre-registering. Therefore employers can avoid from application of compulsory insurance fully or partially. In such establishments employer do not let the employee without labour contract to the workplace while inspections are carried out and so the inspection agency can register only employees with labour contract. And majority of employees working on labour contract are usually provided with compulsory insurance coverage.

Low level of awareness

The level of awareness related to compulsory insurance against occupational accident and occupational disease is very low. There were conducted unstructured interviews with the heads of 35 of small and medium enterprises (SMEs) within this study. Only 5 of them were fully aware of compulsory insurance. 11 people noted that they have general information on it. The rest confused this insurance with compulsory state social insurance.

9. Official statistics on occupational accidents by 2012

Sectors	Number of damaged persons (person)	Number of died persons (person)	Number of occupational accidents
Agriculture, forestry and fishery	1	2	2
Mining industry	12	6	18
Processing industry	22	4	26
Electricity, gas and conditioned air supply	15	7	17
Water supply, wastewater and waste treatment	2	3	5
Construction	54	36	77
Wholesale and retail trade, vehicle repairing	3	4	7
Transportation, warehousing	9	11	15
Hospitality and catering	9	2	10
Information and communication	2		2
Financial and insurance activities	1	1	2
Professional, scientific and technical activities	2		2
Education	1	2	3

Health and social service	4	1	5
Leisure, entertainment and the art	1		1
Other areas of service	21	3	20
Total	159	82	212

10. Recommendation

There are still serious problems in the field of registration and prevention of occupational diseases in the light of the relevant activities relating registration and prevention of occupational accidents carried according to the State Policy on Organization of Unified Inspection System for Registration and Prevention of Occupational Accidents.

The Ministry of Health do not fulfill obligation arising out of the “Law on Sanitary Epidemiological Well-being of the Population” and therefore serious activities aimed at prevention of occupational diseases are not carried out.

No agency has exact statistics on occupational diseases, including the Ministry of Health. “Regulations on State Labour Inspectorate Service under the Ministry of Labour and Social Protection of the Population of the Republic of Azerbaijan” doesn’t include any provision on registration and prevention of occupational diseases among the obligations of the service.

Therefore integrated governance on formulation of policy and implementation of activities related to registration, record keeping and prevention of occupational accidents and occupational diseases doesn’t exist. The role of the State Labour Inspectorate Service regarding determination, prevention and registration of occupational diseases should be increased.

Related to Legislation

It should be created integrated state agency implementing activities regarding provision of fair and favorable working conditions in the workplaces, as well as ensuring labour rights of the employees, identifying policies and conducting state inspection regarding occupational health. Activity principles and fields, powers and responsibilities of the State Labour Inspectorate Service under the Ministry of Labour and Social Protection of the Population should be included in the Labour Code. It should be included the chapter called “Carrying out state control over the execution of Labour Legislation” and provisions on powers, responsibilities and activity fields of the State Labour Inspectorate Service to the Labour Code. The activities regarding determination and prevention of occupational diseases should also been implemented by the State Labour Inspectorate Service.

The Item 1.2 of the Rules of “Investigation and registration of the occupational accidents” approved by the Decision No. 27 of the Cabinet of Ministries of the Republic of Azerbaijan, dated February 28, 2000, includes a list of cases in which should be carried out investigation of deterioration of employees’ health.

One of the cases stated in this Article (the 2nd item) is about injury to the health (including death cases) occurred “during returning from or going to work by the vehicle owned by the establishment and vehicle of other organizations given on the basis of contract (order) of establishment” of which investigation should be carried out.

If an accident happened when employee was going to work by the public transport, by the own car or on foot it should not be considered insurance event (in such cases relevant body, employers and insurance companies practically do not investigate an accident and compensations are not paid). Inclusion of this provision to the regulatory document leads to negative consequences. Certain number of people are injured on the roads while going to (returning from) the work every year.

It's important to amend this provision of the regulatory document. If upon investigation was determined that an employee injured while going to or returning from the work, the case should be registered as an insurance event and the employee should get compensation (if the employee died, the compensation should be paid to his/her legal dependents).

Recommendations on state policy regarding labour protection and reduction of production risks

Creation of a Constant Monitoring Group in the field of conducting monitoring of occupational risks consisted of the State Labour Inspectorate Service, Trade Unions, Union of Employers, life insurance companies, specialized representatives of NGOs, and experts will be advisable. The Constant agency, the scope of powers and responsibilities of which will be defined on a normative-legal act, shall carry out monitoring of annual dynamics of occupational risks and prepare an annual report reflecting recommendations. Submission of the report to the Social Council representing the Ministry of Labour and Social Protection of the Population, Azerbaijan Trade Unions Confederation, Employers' (owners') Confederation and preparation of procedures and regulations for identification of strategies to reduce risks determined in the monitoring process is advisable.

Related to the organization of service spheres in the field of occupational health

There is a need to create service spheres based on commercial activity for provision of safe and healthy labour conditions in workplaces. Organization of such service could be realized by private structures. However, participation of an authority implementing state control in formation of such service spheres should be provided. From this standpoint such services could be created under the authority implementing state control at first. The major activity of the service should consist of the preparation of documents on occupational health in workplaces, preparation of recommendations on application of rules of technical safety, instructing staff, preparation and placement of visual aids, organization of service on occupational health in workplaces, as well as capacity building of staff and etc. Currently, lack of such specialized services causes problems in organization of occupational health in SMEs, as well as organization of activities aimed at reduction of occupational risks.

Related to preparation of standard guidelines on occupational health and safety regulations

Economic development and technical progress require changes in the nature and content of the measures aimed at provision of occupational health. There is a need to make amendments in standard guidelines regarding occupational health by sectors. These guidelines could be the followings:

- General requirements regarding occupational health;
- Requirements regarding occupational health prior to the commencement of the work;
- Requirements regarding occupational health during work time;
- Requirements regarding occupational health in cases of emergency, and etc.

Posting up these guidelines obligatorily in workplaces should be included in relevant regulations. Relevant executive authorities should develop strategies towards improvement of guidelines by employees and types of works and should systematically implement these strategies.