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Administrative Dimensions in the Regulation of Occupational Health and Safety: Focus on the Bureau of Working Conditions

VICTORIA A. BAUTISTA*

The paper primarily focuses on the strategies, resources and performance in the enforcement of Occupational Health and Safety (OHS) by the Bureau of Working Conditions (BWC) of the Department of Labor and Employment (DOLE) – the lead agency of government charged with the regulation of OHS in the Philippines. More specifically, it dwells on the regulatory process itself and other support activities for enforcement such as planning and technical supervision, research, information dissemination, monitoring and evaluation. It also offers policy recommendations towards the enhancement of OHS in the Philippines.

Introduction

Background

The workers are vital components in the production process. Hence, it is important to consider their health and safety in the work environment to assure their productivity. This should be given due consideration because a major part of a worker's daily activity, often amounting to 8 hours or one-third of a day, is spent in the workplace.

In the Philippines, 34,853,000 of the total household population are at least 15 years old, with a big part of this number (64.2 percent) in the labor force[1]. Thus, the regulation of occupational health and safety (OHS) should be a major concern in the Philippines. After all, the bulk of the population 15 years or older constitutes the workforce –the vital resources in the process of development.

This paper primarily focuses on the resources of, strategies, and performance by the Bureau of Working Conditions (BWC) of the Department of Labor and Employment (DOLE), which is the lead government agency charged with the enforcement of occupational health and safety (OHS) in the Philippines. More specifically, this paper dwells on the regulatory process itself and other support activities for enforcement, such as planning and technical supervision, research, information dissemination, monitoring, and evaluation.

Prior to a discussion of the aforementioned topics, this paper will examine the contextual framework within which the enforcement of OHS is undertaken by the

*Associate Professor, College of Public Administration, University of the Philippines. This paper was prepared as the Andres Soriano Professorial Chairholder in Business and Public Administration. It was disseminated to the Bureau of Working Conditions (BWC) of the Department of Labor and Employment (DOLE) in August 1988.

Bureau of Working Conditions (BWC). One contextual framework examined are the policy statements that set the tone and direction for OHS in the Philippines. These directives serve as the frame of reference in analyzing the success of the Bureau of Working Conditions in fulfilling its mission of assuring the health and safety of the country's workers. This paper also discusses the broad structural network for administering OHS, of which the Bureau of Working Conditions is a part.

Theoretical Framework

Nelsie Parrado[2] provides a comprehensive theoretical framework to analyze factors that could affect the health and safety of workers in their respective work environments.

These factors are situated in two kinds of environment the health worker is immersed in. One is the macro-environment consisting of socio-cultural, economic and political factors which could influence the direction of OHS in the workers' work environment.

The second context is the micro-environment itself, "where the dynamic interaction of the actors in the industrial relation system and the work health complex takes place."[3] The immediate micro-environment that directly affects the worker's health and safety is the work environment. Its thrusts for OHS are largely dependent on the interplay of factors pertinent to the management system of the work environment, and the regulatory bodies that enforce rules and regulations on health and safety, such as governmental agencies and non-governmental organizations.

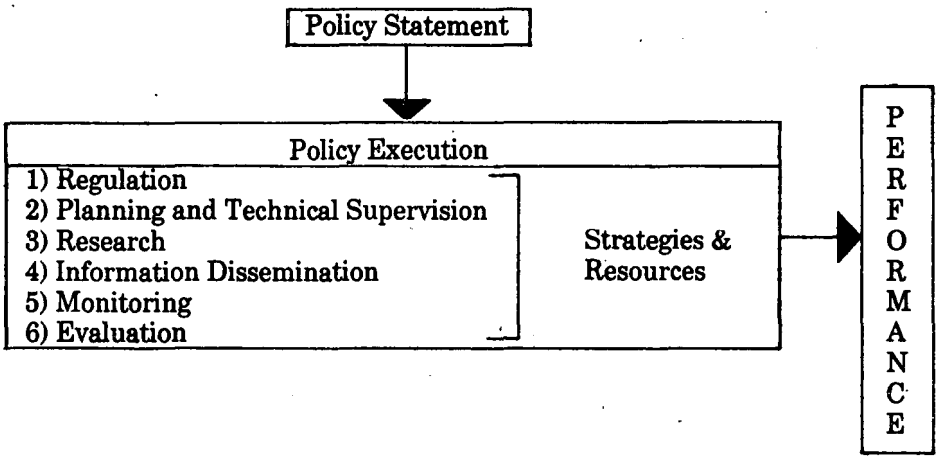
The nature of the work environment that is structured for OHS, in turn, influences the worker. His level of productivity is affected by this as well as by other factors intrinsic to him, such as his work attitudes or work ethics, value orientation, social and family network, religion and culture.[4]

As far as this research is concerned, the principal factor examined is the administration of OHS, focusing in particular on the lead agency responsible for its enforcement – the Bureau of Working Conditions of the Department of Labor and Employment (BWC-DOLE).

It is argued in this research that the performance of OHS programs is partly dependent on the policy framework for OHS and the manner of enforcing the policy framework. Enforcement of the policy is, in turn, dependent on the actual processes or strategies applied and the resources available.

In brief, the framework for analyzing the factors to be evaluated in this study is summarized in Figure 1.

Figure 1
Theoretical Framework of this Research



Policy statement refers to legislation issued and rules on implementation that are pertinent to the process of OHS enforcement and to the support activities that enhance this regulatory process, such as planning and technical supervision, research, information dissemination, monitoring, and evaluation.

Planning as an important activity entails the determination of activities and strategies, and the allocation of resources to fulfill the regulatory function.

Technical supervision, in turn, provides the direction of activities to be undertaken in implementing the regulatory function.

Research as another support activity seeks out new modes of enhancing the regulatory function.

Monitoring helps determine the progress of implementation of the regulatory function.

Finally, evaluation enables the organization to determine the impact on the target clientele of the activities it has pursued.

Policy execution refers to the manner of implementing the policy directive. This may be analyzed in terms of the actual strategies applied to enforce OHS, and other relevant activities contributory to the process of enforcement. Relevance and appropriateness are some factors that may be applied to assess these strategies.

The nature of resources available could also influence performance. In particular, adequacy of resources and their appropriateness to the nature of responsibilities to be fulfilled can affect the way activities for enforcement are carried out.

on the clientele, such as, for example, the actual reduction in injury and death of workers in the work environment.

Methodology

This study obtained data from a review of secondary materials like annual reports, legislations, statistics and other relevant documents pertaining to the history and performance of the Bureau of Working Conditions. Key executives of the principal units involved in the enforcement of OHS in the Bureau of Working Conditions were also interviewed. Six persons were contacted to obtain insights on the dynamics of implementation of each unit in enforcing OHS, and the problems encountered by the respective units in performing their responsibilities. Of the six, one is a division head who occasionally assumes the role as Officer-in-Charge of the Bureau, four are section chiefs and one is a member of the technical staff.

Data collection was undertaken in the first half of 1988.

The Contextual Background for OHS

Policies for OHS

The formulation of legislations in the Philippines that are relevant to OHS may be summarized into two broad periods.

The first period is characterized by the adoption of a **reactive** perspective since policies are formulated to respond to the health and safety problems of the workers as they perform their respective duties and responsibilities in the work environment. Control measures are enforced by regulatory bodies on establishments employing workers whose health and safety are noted to be unduly affected by the nature of the occupational setting.

The second period is characterized by the institution of more **aggressive** policies designed to enjoin management to adopt measures that would promote the health and safety of workers. Unlike in the first period, the stance of government in responding to concerns relevant to OHS is **proactive**. Instead of applying control measures after problems on workers' health and safety in the work environment are reported, preventive measures are instituted and relevant control measures are enforced by the regulatory bodies to assure compliance.

Reactive Policies. Policies to assure OHS are not recent efforts in the Philippines. In fact, legislations for OHS had their beginnings during the American Period with the institution of the Employers' Liability Act No. 1874. Issued on June 19, 1908, this was the first policy ever instituted to ensure the health and safety of the workers that was **reactive** in nature.

The policy directed employers to compensate the family of a deceased worker whose death was attributed to a "defect in the condition of the ways, works or machinery connected with or used in the business of the employer." The defect may either be due to the negligence of the employer or of a person entrusted to assure

Performance can be measured in terms of actual outputs or services delivered by service delivery persons. This can also be assessed in terms of the actual impact the safety of the workers. Workers who were also injured while performing their duties were also expected to be duly compensated.

Act No. 1874, the first labor law enacted during the American colonial period, was lifted verbatim from the Massachusetts Employer's Liability Act of 1887.[5] Hence, Act No. 1847 included provisions regarding the compensation of railroad workers injured or killed while on duty, in spite of the fact that railroad construction during this period was very minimal.

A subsequent legislation was passed on December 10, 1927 (Act No. 3428), known as the Workmen's Compensation Act. This was another **reactive** measure enacted during the American period. However, Act No. 3428 had a broader coverage than Act No. 1874.[6] Damages were expected to be paid by employers for illnesses, in addition to injury or death, due to employment. This law required an additional compensation if the injury was caused by the failure of the employer to observe the law or rules, to maintain necessary safety appliances, or to take required precautions.

Another important enactment was Republic Act No. 1054, otherwise known as the Free Emergency Medical and Dental Treatment Act of June 12, 1954. This legislation was instituted to revise and consolidate provisions of Act No. 3961 relative to free emergency medical treatment and Republic Act No. 239 of June 10, 1948 concerning free emergency dental treatment in establishments. This Act prescribed rules governing the extension of emergency medical and dental treatment to workers of both public and private entities. The number of persons encompassing the team was dependent upon the number of employees and the accessibility of a health outlet that can dispense free medications and treatment.

On the whole, the aforementioned enactments only provided **reactive** rather than **proactive measures** to problems related to maintenance of personnel health and safety in the work environment. This is because sanctions were instituted to the employers when the workplace endangered the safety of the personnel and might have caused injury, illness or death. These acts did not encompass standards that would have made employers assume a more active stance in promoting OHS and in adopting measures to prevent illness, injury or death.

Proactive Measures. The first legislation that directly enjoined management to ensure the promotion of health and safety in the workplace was Commonwealth Act No. 104 passed on October 29, 1936 during the Commonwealth period.

Called the Industrial Safety Law, this act was brief and contained provisions limited to safety in the mining industry. It directed the Secretary of Labor to promulgate and enforce rules, regulations and other pertinent policies to ensure the safety of persons employed in mines, quarries, metallurgical operations and similar endeavors. This led to the formulation of rules and regulations on safety and health in the form of Safety Orders.[7]

Another social legislation that had some relevance to OHS was the Woman and Child Labor Law, otherwise known as Republic Act No. 679. This was passed during the post-independence period and took effect on April 15, 1952. This law formulated provisions indicating the need to assure the health and safety of both women and children while performing their duties in the workplace.

The relevant provisions regarding the health and safety of children were suggested by Section 1(a1) which stated that children between 12 and 15 years of age may only be employed to perform light work which is not harmful to their health or normal development. This law also required the employers of women and children to provide facilities for them such as proper seats, toilet rooms and lavatories.

The most recent directive which has a more comprehensive coverage regarding OHS is the Labor Code of 1974. For the first time, this Code integrates all the existing labor laws of the Philippines, including those pertinent to OHS. This law was passed on May 1, 1974 and in effect repealed the aforementioned laws related to the enforcement of OHS.

The provisions in the Labor Code which refer directly to OHS are embodied in Book Four, entitled "Health, Safety and Social Welfare Benefits." The first chapter contains provisions regarding the role of employers in extending necessary first aid medications and equipment for medical and dental services. This chapter also spells out the medical health team that will have to be constituted in accordance with the number of employees in an establishment, and the accessibility and existence of a medical and dental clinic in the area. The provisions in this chapter replaced the earlier enactments on the Emergency Medical and Dental Law.

The provisions that refer directly to OHS cover various aspects of implementation and management of health and safety standards which are expected to be formulated by the Bureau of Working Conditions. The basic provisions herein are still applicable to the current operation of OHS in the Philippines.

One important feature of the Code is the inclusion of all industries, unlike the earlier Safety Law which concerned only the mining industry. Article 162 of this Law directed the Secretary of Labor to set and enforce "mandatory occupational safety and health standards to eliminate or reduce occupational safety and health hazards in all workplaces and institute new, and update existing, programs to ensure safe and healthful working conditions in all places of employment."

This Code expressly states the need to undertake continuing studies and research to develop innovative techniques in responding to problems on OHS. The research undertakings are to be directed towards the formulation of "medical criteria" or standards that will assure the health and safety of personnel in the work environment.

Another important feature is the directive to the Department of Labor to develop and implement training programs to increase the number and competence of personnel in the field of OHS.

To guide the actual implementation of the legislations pertinent to OHS, the Omnibus Rules Implementing the Labor Code of the Philippines were issued by the then Secretary of Labor Blas Ople on February 16, 1976. The Omnibus Rules contained relevant regulations on Health and Safety which are embodied in Book IV, Rules I and II.

In 1979, the Ocupational Safety and Health Standards (OSHS) was finally codified, providing the guidelines for the maintenance of health and safety standards in the Philippines.

Broad Structural Framework for the Enforcement of OHS

The institutions which regulate occupational health and safety in the Philippines, whether directly or indirectly, are made up of government agencies and non-governmental organizations.

Governmental Agencies

The Labor Code of 1974 has specifically mandated the Department of Labor to be "solely responsible for the administration and enforcement of occupational safety and health laws, regulations and standards in all establishments and workplaces wherever they may be located, "with the exception of chartered cities which may be allowed to conduct industrial safety inspections of establishment within their respective jurisdictions where they have adequate facilities and competent personnel . . . subject to the standards established" by the Department of Labor.

The Bureau of Working Conditions provides the staff support to the Department by formulating the policies, standards and programs to enforce occupational health and safety. The regional offices, in turn, undertake line functions through the Labor Enforcement and Development Officers (LEDOs) who are responsible for enforcing rules and standards on health and safety in workplaces, and for other activities concerning the welfare of workers.

Other government agencies also perform the function of maintaining the health and safety of workers for more specific types of activities. However, no specific provisions in the Labor Code indicate the relationships between the Department of Labor and Employment and other institutions, making it difficult on the part of DOLE to "coordinate the activities regarding OHS."[8]

Some examples of other governmental institutions[9] which contribute to the regulation of OHS include such line agencies as the Department of Health, the Fertilizer and Pesticides Authority, and the Bureau of Mines and Geo-Sciences. Academic- research institutions also contribute by undertaking support activities towards the enhancement of OHS, notably the University of the Philippines' Institute of Public Health. The Department of Health contributes to the enforcement of OHS through the Division of Occupational Health under the Bureau of Health Services and the Bureau of Dental Services. The role of the Bureau of Health Services in forging OHS stems from the directive in the Sanitation Code for the Bureau to oversee the maintenance of sanitation in the general environment, including the workplaces.

Some specific measures were formulated to prevent workers from being afflicted by occupational diseases. These were achieved by identifying, evaluating and controlling the sources of illnesses. Preventive measures were also expected to be enforced by requiring the following amenities in the work environment: (1) potable and safe water supply; (2) collection and proper disposal of solid and liquid waste; (3) food sanitation; (4) sanitary service facilities; (5) housekeeping; and (6) control of rodents and pests.[10]

On the other hand, the Bureau of Dental Health under the DOH undertakes the development and enforcement of dental standards in the country.

The specific contribution of the Fertilizer and Pesticides Authority (FPA), a regulatory body under the Department of Agriculture, may be gleaned from its requirement for pesticide handlers to be adequately trained and to have a license before performing their responsibilities. Among the information monitored by the FPA is the safety of workers in handling pesticide products.[11]

In the case of the Bureau of Mines and Geo-Sciences, a Safety Section, Mining Technology Division enforces OHS in this particular industry. This is done by undertaking inspection of mining establishments to determine compliance with existing rules and regulations.

The input of the UP Institute of Public Health is its offering of a masteral degree in Occupational Health and a post-graduate course for physicians and nurses in the field of OHS. Researches are also conducted by the Institute relevant to OHS.

To avoid duplication of efforts in forging OHS, key leaders of the former Ministry of Labor and Employment and the Ministry of Health signed a Memorandum of Agreement way back in 1980. The two ministries earlier agreed to "jointly prepare programs for the enforcement of occupational safety and health laws" and to "jointly" conduct inspection of industrial plants.[12] It was further agreed in the Memorandum that the MOLE would focus on the maintenance of safety while the MOH personnel would emphasize health. Both offices also promised to cooperate with one another in the training of their respective health personnel to prepare for the maintenance of OHS. However, full enforcement of these provisions has yet to be realized. Based on the March 8, 1988 interview with the Officer-in-Charge of the Bureau of Working Conditions, it was revealed that cooperation has only been fulfilled for the third item and not for the first two.

Another Memorandum of Agreement was also formulated between the Ministry of Public Works and Highway and the MOLE, resulting from the amendment of the Occupational Safety and Health Standards (OSHS) to include the National Building Code in 1983. The new National Building Code was formulated as a result of a major disaster that occurred while the Manila Film Center was under construction.[13] The Memorandum of Agreement authorized the MOLE to evaluate and recommend the proper installation of machinery, protective devices, and safety requirements for the protection of workers.[14]

Other Memoranda of Agreement were proposed to be drafted with other agencies such as the National Environmental Protection Council, National Pollution

Control Commission, Food and Drug Administration, Philippine Atomic Energy Commission, Fertilizer and Pesticides Authority, National Crop Protection, and the University of the Philippines' Institute of Public Health.[15] These were sought out to avoid further conflicts in the formulation and implementation of standards concerning OHS. However, these arrangements have not yet materialized.

Non-Governmental Organizations

Non-governmental organizations have also played an important role in enhancing OHS for the workers in the Philippines. They may be categorized into socio-civic organization such as the Safety Organization of the Philippines, Incorporated (SOPI); labor organization such as the Trade Union Congress of the Philippines (TUCP) and the Federation of Farmers' Association (FFA); employers' association such as the Employers Confederation of the Philippines (ECOP); and professional organization like the Philippine Occupational and Industrial Medical Association (POIMA).[16]

The contributions of the aforementioned groups are in the form of undertaking information campaigns, conducting researches and/or providing inputs to appropriate segments of government that help in shaping up the rules and standards to regulate OHS.

Processes for Coordination

To organize efforts of both the governmental and non-governmental organizations in OHS, the DOLE has initiated the convening of tripartite bodies to obtain a multi-sectoral perspective in the formulation of standards and the enforcement of OHS in the Philippines. The tripartite body is made up of representatives from government, employers, workers and other socio-civic organizations which find interest in forging OHS.

A tripartite body was created in 1977 to study the draft of the proposed standards prepared by the former Ministry of Labor and Employment. The proposed safety regulations were finally called the Occupational Safety and Health Standards (OSHS) which were passed in 1978. A tripartite body was thereafter convened in 1986 to review the OSHS.

Other tripartite conferences were also held to assess efforts towards the enforcement of OHS. Tripartite conferences on the Improvement of Working Conditions and Environment were held in 1977 and in 1984.

As a result of the tripartite conference on the improvement of working conditions held in 1977, it was proposed that a more permanent working committee be set up "to design, initiate and coordinate tripartite action programs for improving working conditions in the Philippines".[17]

In response to this resolution, the Institute of Labor and Manpower Studies and the Bureau of Labor Standards organized a tripartite coordinating committee, otherwise known as the National Tripartite Committee for the Improvement of Working Conditions. This was formally organized on October 12, 1978 and later

renamed as the National Council for the Improvement of Working Conditions. Envisioned as a body to advise the then Ministry of Labor and Employment in the "review and evaluation of policies and in the coordination of efforts in information dissemination," its effectiveness in performing these roles was questioned in the Tripartite Conference in 1984; a question that still plagues the current administration.

The Bureau of Working Conditions: Structures, Processes, Resources and Performance

Background

The Bureau of Working Conditions is the primary unit of the Department of Labor and Employment that is responsible for planning and formulating policies on the administration and enforcement of OHS and labor standards. Known since its creation as the Bureau of Labor Standards, it was renamed as the Bureau of Working Conditions on May 1, 1982 with the issuance of Executive Order No. 797.

The retitling of the Bureau was purportedly "not an idle or empty gesture".[18] It was renamed as a reminder that:

> Apart from its traditional role of setting standards and rules in implementation of labor standards legislations, the Bureau is now called upon to assume the responsibility of conceptualizing, developing and implementing policies and standards that will humanize the working environment and improve the quality of life of the workingman.[19]

Three divisions assist the director of the Bureau in performing its functions, namely: the Health and Safety Division, Labor Standards Research Division and Inspection, Standards Division. The fourth division, Wage and Hour Division, performs other responsibilities not directly related to occupational health and safety.

The Bureau provides staff support to the actual function of enforcement which the regional offices undertake. Hence, prior to a discussion of the support services extended by the BWC, an introduction regarding the enforcement activities will be initially made in the subsequent section.

Enforcement

Personnel. The actual function of enforcing standards pertinent to OHS is assumed by the LEDOs (or the Labor and Employment Development Officers). Formerly, the LEDOs were called either as Labor Regulation Officers (LROs) or Industrial Safety Engineers (ISEs). The LROs were tasked to enforce all labor standard laws while the ISEs were concerned with technical safety of equipment in the workplace, including the conduct of general occupational safety and health inspection.[20]

In 1982, an integrated inspection system was launched. This approach meant that those formerly assigned to conduct inspection of general labor standards will

also be tasked to conduct general health and safety inspection.[21] Hence, both the ISEs and the LROs were then called Labor Standards and Welfare Officers.

The rationale for integration was to assure a more "effective and economical" inspectorate system.[22] This approach was also envisioned to invigorate the inspection efforts on occupational safety and health, inasmuch as "very little had been done" on this aspect in the previous years, and no less than the former Ministry of Labor and Employment had admitted this.[23] The former Ministry attributed the limited attention given to OHS to the shortage in the number of safety engineers who were tasked to conduct such type of inspection, but whose time had been poured into technical safety inspection. Another reason was that the pool of inspectors is not adequately trained to appreciate and implement the basic principles and standards on general safety and health standards.[24]

With the change of administration, the Labor Standards and Welfare Officers were renamed as Labor and Employment Development Officers or LEDOs.

To date, a total of 252 LEDOs cover 386,545 establishments. This means that one (1) LEDO serves a total of 1,534 establishments or that each LEDO should cover about 6 establishments per day for a total of 260 working days. This is not humanly possible considering the tasks assigned to the LEDO to assure the enforcement of OHS.

Furthermore, it will also be noted that there is an unequal distribution of LEDOs by region. Regions VI, VII and NCR are the three regions having the lowest ratio of the number of establishments assigned per LEDO. On the other hand, the three regions with the most number of establishments assigned to LEDOs are those from Regions I, III and IV. (See Table 1.)

Strategies. To cope with the numerous establishments that LEDOs have to cover, the strategy adopted by the DOLE was to undertake inspection on establishments which require priority attention. Per Ministry Order No. 8 (issued on September 1986), the "inspection priorities" may be of two types.

One is called a "programmed inspection" which includes establishments known to be plagued by labor disputes based on strike notices and complaints filed by workers. Establishments which are "generally known as maintaining hazardous and oppressive working conditions, like sweatshops" can also be subsumed under a "programmed" type of inspection.[25]

"Unprogrammed inspections" may be carried out if there are establishments which pose "imminent danger" or are involved in "work-connected fatalities or catastrophes." These establishments may be discerned based on reports from media or from complaints of any person, whether formal or informal.

Unprogrammed inspections are expected to be scheduled and conducted prior to programmed inspections.

Each Regional Office is expected to prepare and submit an inspection program based on guidelines embodied in the Labor Inspection Service Manual as prepared

by the DOLE. The program of activities is to be submitted to the Bureau of Working Conditions on or before the first week of January of every year for approval.

Table 1. Distribution of LEDOs by Region

Region	Number of LEDOs	Number of Establishments	Ratio of LEDOs to Establishments	Ranking of LEDOs w/ Least to Most Number of Establishments
NCR	63	71,494	1:1,135	3
I	15	34,271	1:2,285	13
II	12	16,155	1:1,346	7
III	24	46,455	1:1,936	11
IV	19	64,408	1:3,390	12
V	12	19,013	1:1,584	9
VI	25	22,469	1:899	1
VII	16	17,859	1:1,116	2
VIII	11	13,166	1:1,197	4
IX	14	17,263	1:1,233	5
X	15	23,739	1:1,583	8
XI	16	27,089	1:1,693	10
XII	10	13,054	1:1,305	6

Source: Labor and Employment Statistics compiled by the DOLE, based on National Census and Statistics Data for 1987.

The Inspection Program per region is expected to embody the following, as required by the Labor Inspection Service Manual:

(1) Classification of establishments by industry such as agricultural, manufacturing, etc.;

(2) Periods covered by the inspection of prioritized or selected industries, with only one industry or type of enterprise to be inspected within a given period;

(3) Estimated number of establishment in the industry or enterprise to be inspected and the estimated number of employees;

(4) Name, location or address of establishment in each industry scheduled for inspection;

(5) Number and name of labor inspectors assigned to conduct inspection in the industry scheduled for inspection;

(6) Estimated number of inspection per inspector per day;

(7) General statement of the justification for the proposed inspection program.

One problem noted in the preparation of the inspection program is the non-compliance of some Regional Directors with the deadline for submission of the report. When a review of the inspection program for 1988 was made by this researcher in April 1988, only eight regions have turned in their plan of activities so far.

Furthermore, it was noted that out of the eight program reports reviewed, only one complied with the requirement that an estimated number of daily inspection per inspector be included in the report. Compliance with this requirement is important as this would indicate the work load of every LEDO for a given period.

The actual process of inspection may be categorized into three types.[26] One is the general labor standards inspection which is concerned with wages, hours of work, living allowances and other statutory monetary benefits of workers. The second is general safety and health inspection which deals with the physical and environmental condition in workplaces. The third is technical safety inspection which involves inquiries into the safety features of boilers, pressure vessels, electrical installations, elevators and other equipment.

On August 14, 1979, labor inspection was temporarily suspended because of reports regarding abuse of power and authority by some labor regulation officers and industrial safety engineers. Inspection activities were only undertaken for establishments which had been objects of complaint. Inspection activities were resumed in 1986 after a pilot training program for the inspectorate had been undertaken in August 1984. The training program aimed for the integration of occupational health and safety inspection into the process of undertaking labor inspection.

Violations discerned by the inspectorate are reported to the Regional Office, with the inspector giving the appropriate recommendations to correct the situation. The LEDO may either recommend work stoppage or suspension of operations, if any firm or department poses grave and imminent danger to the health and safety of the workers.

However, the problem lies in enforcing compliance with the recommendations and corrective measures among the violating establishments. To date, the BWC is not authorized to exact fines from erring establishments. Sanctions for "middle-range problems" are non-existent, and closure may only be recommended by the LEDOs for extreme cases.

Planning and Technical Supervision

The Inspection Standards Division performs a crucial role in support of the regulatory function. It undertakes planning, programming, development of standards, and functional supervision of inspection activities for the proper observance and enforcement of standards on working conditions.

Two sections backstop this Division. One is the Technical Inspection Supervision Section which develops the methods, procedures and plans of inspection for the operation and installation of equipment such as boilers, pressure vessels, internal combustion engines, elevators or escalators, in agricultural and non-agricultural establishments. The second section, called the General Inspection Section, focuses its concern on the enforcement of standards for working conditions, to safeguard the workers' safety and health and to assure compliance with other labor standards.

Training is undertaken by this Division to enhance the capability of the LEDOs. It is also responsible in preparing strategies for enforcement and specific guidelines in the submission of reports by the inspectorate system. It takes the responsibility of designing inspection manuals and other inspection aids such as the ones mentioned earlier.

Technical supervision is pursued by conducting spot checks of field offices to assess the effectiveness of inspection procedures and practices. In the process, technical assistance is also provided on matters relating to inspection activities.

Seventeen (17) persons compose this division, with 15 performing technical functions and the remaining two, administrative responsibilities. The staff constituting this division have educational backgrounds mainly in engineering and law.[27]

Information Dissemination

The Safety Promotions and Information Section is the specific unit charged with providing information to the public regarding the maintenance of OHS. It develops safety education programs and conducts activities to create safety consciousness among the employers, workers and the general public.[28] It is also expected to devise ways and means of organizing safety committees in all places of employment and developing model programs for such committees. On the whole, it is meant to serve as the nerve "center" in providing information regarding sources of information on OHS.

This office actively undertakes effort to simplify the campaign for OHS by preparing posters, brochures and catalogues regarding the maintenance of safety in the workplace. The materials are often disseminated to the regional offices so that these can be made available to interested establishments. It has also planned to publish more popular materials like comics, but its financial resources are not adequate to undertake this activity.

While the name of the Section signifies its crucial role in disseminating information regarding OHS, one major activity that takes most of the efforts of its ten staff members is the analysis of the impact of OHS activities based on a review of the work injury or accident reports submitted by establishments. The Section considers this activity relevant to the role of information dissemination, as findings from these reports enable the Section "to propose effective safety measures."[29]

Monitoring

The process of monitoring compliance with the rules among establishments prioritized by the Bureau of Working Conditions is also undertaken by several persons. Foremost among those who perform this responsibility are the staff of the Inspection Standards Division through the information gathered by the LEDOs. Next are the staff of the Occupational Health Section and the Safety Promotions and Information Section, which are both under the Ocupational Health and Safety Division.

Inspection Standards Division. The Inspection Standards Division gathers basic information about the compliance of establishments based on the report submitted by the LEDOs. When plant visits are made by the LEDOs, they gather information using a standard form. The inspection report form includes data on the establishment visited such as the nature of business undertaken, the profile of the employees, the total assets of the establishment and the type of workplace.

The inspection report also covers a checklist of violations on general labor standards particularly those concerning wages or bonuses, additional compensation and hours of work. The LEDO is also expected to fill up the data on compliance with occupational health and safety. The data to be gathered concern the number of health personnel and health facilities available. Furthermore, a checklist of violations regarding OSHS is also included such as those pertaining to work conditions, work environment and plant machinery.

The inspection reports of the LEDOs are then integrated by the Inspection Division under the Bureau of Working Conditions. The overall profile of the establishments covered in the report is aggregated by the central office and embodied in the annual report.

One problem discerned in analyzing the performance of the BWC in undertaking the inspection function is its failure to reflect information on the total number of establishments targeted for inspection. The report on accomplishments of the inspectors only covers the total number that has been inspected and those with violations. Hence, it has not been possible to ascertain the productivity of each LEDO since information on target for coverage was not reflected. Only an estimate of efficiency can be made since the available information is on the estimated number of establishments targeted nationwide. This number has remained pegged to 50,000 for the last 10 years.

More advanced equipment and tools such as microcomputers, which can facilitate the processing of the data monitored, appear to be wanting.

The ability of the LEDOs to reach the target priorities seems to be very meager. Furthermore, if the effect of the LEDOs is assessed on the basis of reduction in the number of violations, their effect seems to be very insignificant. Data show that the number of establishments visited as against the 50,000 targeted as priorities has been very erratic. In 1976, 27.8 percent of the estimated 50,000 programmed establishments had been visited. Of the 10,898 establishments that had been inspected, 36.4 percent had violations in OHS. In 1980, no inspection reports

were evaluated due to the suspension of inspection activities since August 14, 1979. In 1983, 14.3 percent of 50,000 were reported to have been inspected. However, the report on violations in OHS declined compared to 1976 since only 10.1 percent of the 7,176 establishments were reported to manifest violations. By 1987, a slightly bigger number of establishments (7,306 in all or 14.6 percent of 50,000) had been inspected compared with 1983. Furthermore, the data showed that the total number of violations with respect to the number of establishments visited drastically increased, as 46.4 percent of the total number of establishments visited showed violations in OHS.

One of the top three violations reported in 1987 by the inspectors concerned non-compliance by some establishments with the formulation of safety committees. The safety committee is supposed to comprise representatives from management, workers, and health and safety personnel. The total number of safety men to compose the committee is dependent on the number of workers in a given establishment per shift.

The two other top-ranking problems pertained to the inadequacy of resources. One was the limited number of health personnel and the other was the lack of material resources such as medicines, supplies and appropriate equipment for the maintenance of health and safety of workers.[30]

The Occupational Health and Safety Section. Another unit that monitors programs undertaken by BWC is the Occupational Health Section under the Occupational Health and Safety Division.

The Occupational Health Section, among other responsibilities, analyzes the medical reports submitted by the industries annually. The monitoring form which is submitted by a health personnel from the reporting establishment contains information regarding the hazards in the workplace (i.e., chemical, physical, biological and others). It also indicates information about the number of cases diagnosed or treated in routine work at the establishment's clinic, infirmary or hospital, including the cases sent to other health outlets.

The information is then summarized according to the type of injury or disease treated, medical examination done and laboratory tests rendered. However, lack of compliance among the establishments in the submission of these requirements is a major problem encountered by this Section.

Safety and Information Section. The Safety Promotion and Information Section also monitors some information concerning the existence and activities of the safety committees which each establishment is supposed to constitute. The report on this matter is to be submitted annually.

This Section also encounters the same problem that plagues the Occupational Health Section. This is the poor turnout in the number of safety committees submitting their reports.

Research

The different offices undertaking the research function are the Labor Standards Research Division, the Occupational Health Section and the Standards Test Section. The last two offices are both under the Occupational Health and Safety Division.

Labor Standards Research Division. The Labor Standards Research Division formally started its functions in 1983 when the Bureau of Working Conditions was reorganized. The Division was established after integrating the functions of the defunct Institute of Occupational Health and Safety.

The creation of the division was envisioned to "serve as the modest beginning of a research center that will undertake basic and practical researches of physical, chemical, biological and ergonomical hazards in the workplaces."[31] The Division was set up to provide the nucleus of the proposed Occupational Health and Safety Center (OHSC). The OHSC was inaugurated last March 15, 1988. On this occasion, the Japanese government which funded this complex turned over the Center to the Philippine government, particularly through the Employees Compensation Commission.

The specific office undertaking research for OHS under the Labor Standards Research Division is the Work Ergonomics, Physiology and Psychology Section. This Section conducts basic and practical researches on the effects of different methods of work on the human body; the strain imposed by various jobs and the energy required in their performance; the nutrition of workers in different kinds of work; the best working methods from the physiological point of view in different jobs; the suitable working hours and breaks; the appropriate working positions; and other ergonomic aspects. It is also tasked to do studies on human engineering with special emphasis on the design of machinery, tools, seats, work space and posture based on studies of the anthropomorphic measurements of Filipino workers.[32]

The same section is also assigned to make studies related to occupational psychology and mental health in the industry. The psychology in accidents and the human side of accident prevention are also considered to be within its area of concern. Other aspects expected to be within the scope of its interest are the mental aspects of productivity, human relations in industry, job analysis, job placement and selection of workers.

Considering the numerous expectations that the Section is supposed to fulfill, the current pool of technical personnel (numbering seven in all) is not adequate to match them. Hence, no less than the section chief claims that there are topics that took some time before they were dealt with. For example, such topics as work organization, job content and welfare facilities were only considered recently.[33] Thus far, the Section has undertaken studies on the health hazards of certain jobs such as on the semi-conductor, electro-plating, metalworking and woodworking industries.

Some modern facilities are available to test the physical effects of the environment. The pieces of equipment available were donated by the Japanese government. These include the sound level meter, digital dust counter, glove temperature meter and the psychometer. The latter two instruments are used to measure temperature.

Most of the researches undertaken are conducted in Metro Manila because of the limited budget allocated for transportation expense.

Another section that was established in 1983, together with the Work Economics, Physiology and Psychology Research Section, was the Industrial Hygiene, Toxicology and Occupational Disease Research Section. This Section was envisioned to conduct basic and practical researches on atmospheric control of temperature, humidity, and noise, among others, in the workplace; and the toxic effects of substances used in industry and industrial health epidemiology. The Section was also tasked to formulate diagnostic methods and preventive measures for occupational diseases. It was also given the responsibility of organizing in-plant and small plant medical services and health examination in the industry.

To date, the functions of this particular Section have been absorbed by the Occupational Safety and Health Center using its staff and others who may also be tapped from the Bureau of Working Conditions.

The establishment of the OSHC has generated some amount of "confusion and anxiety" among the staff since there is no assurance about their status and there is a lack of clarity in the delineation of responsibilities between the OSHC and the BWC.

The Occupational Health and Safety Division. Two other sections under the Occupational Health and Safety Division also undertake studies related to OHS. One is the Occupational Health Section which focuses primarily on the health aspect such as the preparation of a catalogue on toxic substances.

Some of the Section's research thrusts overlap with the Ergonomic Section of the Labor Standards Research Division. The only distinction is the emphasis given to desk research by the Occupational Health Section because of the absence of more advanced tools or equipment and the limited number of personnel that can carry out empirical research. Only eight technical personnel man this Section.

Besides the research activity, other functions are also expected to be fulfilled by this Section, like information dissemination and monitoring of the medical and health programs of industries based on medical reports to be submitted to this office.

The Standards and Test Section, in turn, undertakes research to assess the safety of technical equipment. Like the Occupational Health Section, its major strategy in undertaking research is by reliance on review of secondary materials such as those farmed out by the International Labor Organization (ILO). "Desk research" is the dominant mode rather than actual conduct of tests which is ideally envisioned for this Section to do. The major difficulty in conducting empirical

research is the lack of technical personnel (only eight persons constitute this Section) and the lack of equipment to implement actual "tests".

Both sections also undertake policy studies that could lead to the reformulation of certain standards in OHS. For example, a study is currently being implemented to find out the capability for weightlifting by stevedores in the ports. The ultimate aim of this undertaking is to formulate standards with respect to weightlifting. The new standards that are identified by this Section are reviewed and consolidated by the Standards and Tests Section.

In general, the basis for selecting topics for research is still reactive than proactive. This is because the topics selected for investigation are primarily those considered to cause hazards to or problems on health and safety. These are problems often identified by the technical staff themselves and validated through a participatory process such as the tripartite congress coordinated by the BWC.

Evaluation

The specific unit charged with the responsibility of determining the impact of the OHS program on the workers is the Safety Promotions and Information Section. It undertakes studies on work accidents and illnesses and their nature and causes. The information gathered here becomes the basis for the feedback information of BWC to establishments regarding the areas where hazards can be prevented.

Other information sought by this Section concerns the cost of accident or illness incurred by the establishment in the form of defrayed medical, hospitalization and burial expenses. It also estimates the losses incurred in the damage of machinery and other material implements.

Each agency is expected to submit a form every 20th day of the month following an accident or illness. A standard form has been prescribed to gather the information required. This task takes the major effort of this Section, in spite of the fact that it has been principally charged with the function of disseminating information regarding the maintenance of safety in the workplace.

Its major problem in assessing the impact of the program is the non-compliance of establishments in submitting reports concerning illnesses and accidents. While the *Work Accidents Report* is considered to be a key output of this unit, it has been difficult to bank on the statistical data since the derived information relied primarily on the reports submitted by cooperating establishments.

Over a period of 20 years, only an insignificant number of establishments transmitted reports to the office. In 1970, 84 submitted reports. In 1975, this even declined to 29. In 1980, a year after the inspection process was temporarily suspended, only 46 turned in their reports. This number more than doubled in 1985 when the drive to step up inspection efforts was renewed through the integration of occupational health and safety in labor and technical inspections. Thus, a total of 127 establishments submitted their reports in 1985. By 1986, the number further increased to 147.

Major Findings, Policy Implications and Recommendations

On the whole, while vast strides had been made in the formulation of a proactive policy for OHS, the administrative constraints encountered by BWC has made it a reactive unit in the actual implementation of the regulatory function. It has been perennially beset by administrative problems which hamper the full realization of its functions.

The major findings concerning the problems and issues on the administrative dimensions of OHS are summarized in the following sections. Some of the policy implications or specific recommendations will thereafter be considered after the observations are made.

Relationship with Other Institutions

Problems. One problem area concerns the structural relationship of the Bureau of Working Conditions with other institutions that forge the occupational health and safety of the workers. While it has initially made Memoranda of Agreement with the Departments of Health, and Public Works and Highways, some of the terms in the agreements still remain to be fully enforced. For example, the BWC has not yet successfully realized the undertaking of "joint inspection" activities with the DOH in the enforcement of OHS.

Furthermore, more Memoranda of Agreement with other institutions performing related activities towards the enhancement of OHS will have to be formulated. Some of these institutions are the Food and Drug Administration, the Fertilizer and Pesticides Authority and the Institute of Public Health of the University of the Philippines.

Then there is also the tripartite committee. It is supposed to perform advisory functions to the DOLE but has not actually been fully tapped.

The relationship of the BWC with the Occupational Health and Safety Center seems to be causing a bit of anxiety among some of its staff. While it has been clarified at the outset that the Labor Standards Research Division (particularly the Industrial Hygiene, Toxicology and Occupational Diseases Research Section) will form the nucleus of the Center, some of the persons who will be left behind expressed the need for a clearer delineation of responsibilities between the Center and the BWC.

Recommendations. First of all, it seems urgent to define the relationship of BWC with other institutions. The most immediate issue is how BWC stands in relation to the Occupational Health and Safety Center. While the Center provides wide opportunities to enhance knowledge regarding OHS, the anxiety it causes to the personnel who will be remaining at the BWC may be threatening to their morale. Second, BWC has to reassess its relationship with other institutions and how it can effectively coordinate with them. BWC needs to examine existing Memoranda of Agreement and determine what aspects of the agreement are workable and which provisions need modifications. Third, the BWC may revitalize the tripartite committee as a consultative body in major decision-making areas. Since the Constitu-

tion emphasizes a "participatory" strategy at all levels of "social, political and economic decision-making," the potentials of the committee in infusing ideas to the BWC and in facilitating communication with relevant segments of the public may be tapped.

Enforcement.

Problems. The process of inspection as a strategy to enforce OHS is perennially beset by inadequacy of personnel to effectively cover all the establishments in the country. While this lack has been addressed by prioritizing establishments according to certain criteria, a 100 per cent coverage of the prioritized establishments has not been made possible.

There is also the problem of exacting compliance among industries that have made violations. The difficulty with "enforcement" has been attributed to the lack of police power among inspectors. They have no authority to impose sanctions such as "fines" when violations are verified. While inspectors may recommend "closure" of establishments which pose imminent danger to the workers, this is considered to be an "extreme" measure and therefore inapplicable to organizations with "middle-range"problems.

Recommendations. The difficulty of the inspectorate to cover establishments in its priority listings may be eased by applying probability sampling in selecting establishments programmed to be inspected on a yearly basis. The exceptions are establishments against which certain individuals or groups have complaints and which would require the immediate attention of the BWC.

Probability sampling is a strategy which emphasizes the principle of randomness in selecting the elements to be studied. The advantage of this strategy is that the establishments to be included for inspection will be selected in an objective manner and will avoid the bias of inspectors.

Probability sampling also enables the BWC to make generalizations about the compliance of establishments since the samples obtained are assumed to represent the population that BWC wishes to study. Probability sampling enables one to make choices about sample sizes that can match the number of LEDOs who will perform the enforcement function. Adopting this option implies training of the inspectorate system in undertaking probability sampling.

A second recommendation is the need to explore possibilities of widening the powers of the inspectorate to exact compliance on the part of the establishments. However, when the police powers are broadened, the BWC should also be able to determine what control measures can be inculcated to prevent abuses of power and authority.

An alternative strategy is to encourage "factory-based primary health care". The advantage of this approach is that it encourages the workers themselves to plan and implement activities that could enhance their health and safety in the workplace. Thus, there will be less dependence on government to oversee compliance of various establishments with standards in maintaining health and safety

in the work environment. A participatory approach will also be more gratifying on the part of workers.

Planning and Technical Supervision

Problems. Another difficulty has to do with the failure of some regional offices to turn in their plan of activities on time and in accordance with the criteria formulated by the Inspection Division. This constrains the timely preparation of a rational program of activities.

Some other criteria need to be incorporated to determine the performance of the inspectorate system. To ascertain the level of effectiveness of the inspectorate, actual output has to match with the actual targets for coverage. The latter information is not consistently provided in the program of activities per region.

Recommendations. The BWC must also inspire compliance among the regional offices to submit their reports on time and to supply all the necessary information in their programs of activities. This will enable a more rational assessment of performance when information concerning targets is matched with actual outputs.

Research

Problems. It appears that the researches conducted by the BWC remains to be **reactive** for the most part rather than being **proactive**. This is because the topics chosen stem from the existence of a problem. The problem is often identified by the technical staff and often validated in intersectoral meetings such as the tripartite congress.

A proactive policy in undertaking research is hardly the guiding principle since little emphasis is given on exploring **possible** hazards in the workplace even before they are noted to affect the health of the workers. Attempts are made to be proactive in certain instances, such as the plan to evaluate the effect of video terminals in anticipation of possible problems that may affect their usage. However, interest in pursuing studies of this type is not yet matched by the current pool of personnel.

Furthermore, reliance on "desk research" rather than on empirical research hinders the development of indigenous or local strategies and standards that would respond to some hazards peculiar to the work environment in the Philippines. Secondary materials are admittedly of foreign origin and written by scholars from developed countries like the United States and Japan.

Moreover, a clarification in the internal structural arrangement is neccessary as there is an overlap of functions insofar as research is concerned. For example, health hazards are a converging point of interest between the the Occupational Health Section and the Industrial Hygiene, Toxicology and Occupational Disease Research Section. The absorption of the latter by OHSC might resolve this.

Recommendations. It may be necessary to restructure the Occupational Health and Safety Division as well as the Labor Standards and Research Division so that

overlapping responsibilities may be avoided. Consequently, efforts of the staff may be fully geared to activities that are fully specialized rather than being integrated. For example, there could be a separate section to undertake more developmental and exploratory types of studies, apart from policy studies or studies that review standards or rules.

Efforts should likewise be directed towards generating more funds to enable the conduct of more empirical researches that will test the validity of foreign standards. Furthermore, additional resources would provide more opportunities in assuming a proactive, rather than a reactive policy in conducting researches.

New directions for training may be necessary to upgrade technical skills as more empirical studies and policy researches are undertaken.

Information Dissemination

Problems. Information dissemination as a process is important in conveying the recent findings towards the maintenance of safety in the workplace. The section in charge of this function has aimed high in terms of presenting their materials in a manner that can capture the interest of workers and leaders of enterprises. It hopes to venture into presenting new information in the form of comics, in addition to the current approach of disseminating information on safety through pamphlets, mimeographed materials and posters. However, lack of adequate resources hampers the realization of this plan.

Lack of adequate resources has also prevented the section from assuming a proactive stance in disseminating information to the public. The dissemination of materials are made on the basis of requests for relevant information among establishments, often transmitted through the nearest regional office.

Recommendations. More innovative strategies can be encouraged to readily attract the target clientele. A wider coverage of the information transmitted may be assured through a more attractive packaging of the information being disseminated.

Monitoring

Problems. Monitoring is an important process to determine the progress of various components of the program in fulfilling the objectives of maintaining health and safety. Monitoring forms are so structured to determine if compliance with the norms and rules regarding OHS are manifested by the establishments.

It has been noted that various sections in the BWC perform the monitoring function. While each gathers information pertinent to different substantive areas, such disparate gathering of information prevents an understanding of the possible interrelationships of factors each section attends to.

For instance, the Inspection Standards Division has the inspectorate network focusing on personnel in the establishments who are expected to contribute to OHS as well as the actual violations directly observed in the environment. In the case

of the Safety Promotions and Information Section, the focus is on the report submitted by the safety committees. On the other hand, the Occupational Health and Safety Section relies on the actual activities undertaken by the health personnel of the different establishments and their observations on health hazards existing in their respective work environments.

It may be noted that the Inspection Standards Division is the only section that relies on primary data in the process of monitoring. The others rely on reports submitted by specific segments of the clientele.

Some amount of overlap is noted in the assessment made by the Health and Safety Section and the report of the inspectorate. This is because the report of the inspectorate also covers health personnel and hazards in the workplace as actually observed by the inspectors. The only difference is that the health personnel add in their reports the kinds of treatment they extended to the workers in their respective establishments. Inasmuch as the monitoring activity is not undertaken in a concerted manner, it is not possible to draw interrelationships among the factors various sections are assessing. One problem of interest could be determining the relationship between the performance of the safety committees and the actual reduction in the number of hazards in the workplace. Another interrelationship that may be worth examining is the influence of performance by the health personnel on the reduction of hazards in the workplace.

It is difficult to rely on monitoring data consolidated by different sections in determining the overall performance of different segments in the workplace. This is because the reports submitted, particularly those pertaining to the safety committees and health personnel, are spotty and statistically inadequate to enable BWC to make generalizations. A major problem encountered by the BWC is the lack of compliance on the part of establishments in turning in reports regarding their safety committees and health personnel.

Recommendations. It may be necessary for BWC to design strategies to increase compliance of the different establishments in submitting their reports. Furthermore, BWC may also consider undertaking its own monitoring of actual performance by the different components of the work establishments that contribute to the enhancement of OHS. If this cannot be undertaken at present by the existing offices that monitor these particular components of the establishments, can this function be integrated into the inspectorates' role?

An analysis of information collected about the various components of the work establishments can be enhanced through an analysis of the interrelationships of factors which could explain why or why not hazards in the workplace are more dominant in some than in others.

Evaluation

Problems. The conduct of evaluation goes beyond monitoring as an agency begins to look into the inputs and outputs when fulfilling certain objectives of the organization. The process of evaluation takes into consideration the impact of the program on the clientele.

The specific unit of BWC that undertakes impact evaluation is the Safety Promotions and Information Section. It is puzzling that an office primarily tasked with dissemination of information regarding health and safety also undertakes an evaluative activity. In fact, one of the major tasks of this Section is to come up with a report on the type of injuries experienced by workers and the specific factors that led to these.

A critical issue that can be raised here pertains to the ability of the BWC to make generalizations on the effectiveness of the OHS program based on spotty information gathered from establishments. A major problem that plagues the Safety Promotions and Information Section is the failure of establishments to comply with the requirement to fill up information on accidents encountered in the work environment.

Recommendations. It may be necessary for the BWC to validate the information submitted by the enterprises through its own survey based on ramdomly selected establishments.

It may also be helpful for an independent research body to undertake a thorough evaluation of the effectiveness of the occupational health and safety program, to ascertain if the findings tally with those generated by the BWC. It can be also argued that an independent body will have a more objective posture in undertaking the assessment as there is no personal stake involved in whatever findings that may be obtained from the study.

Evaluation studies on the interrelationships of factors that may influence the effectiveness of OHS programs are also important so as to have a comprehensive understanding of factors that contribute to or impede the enforcement of OHS. These factors should include the administrative components of the program, the nature of the establishments, as well as the characteristics of the workers. The existence of various groups (e.g., labor groups) and whether the participation of the workers in these groups have facilitated the enhancement of OHS also merit scrutiny.

Occasionally, studies on problems encountered by the small businessess which are hardly covered by BWC will have to be evaluated. They are the sectors that may need the most protection since workers in these small firms are less organized than those affiliated with bigger enterprises.

An evaluation of the contribution of various organizations (both governmental and non-governmental) in the enhancement of OHS needs further study. How are they interrelated? Do they coordinate effectively? These are some of the issues that can be raised when this topic is considered more closely.

Lastly, more advanced tools and techniques may be considered for a more efficient processing and analysis of data.

It is necessary, therefore, for the top leadership to refocus its attention on measures that can be extended to enhance the administrative capacity of BWC for regulation. The administrative components of regulation, after all, are important

elements in executing the policy directive to maintain the health and safety of workers. The implementation of a proactive policy can only be fulfilled if the administrative resources are adequate and capable in matching the requirements of such policy.

Endnotes

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