

Workplace health as system quality

The Requirement That Turns Inward

From published principle to governance that can be verified. A benchmark of 65 organisations and 1,193 published sources.

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For internal use and for sharing with partners and advisers

Summary

An external reader can verify far more of an organisation's outward governance than of the same governance turned inward.

Organisations govern demanding areas well when the requirement is clear. Environment, quality, information security and supply chains usually have a named owner, a framework, resources and a regular review. This report asks whether the same governance is equally visible when the subject is the workplace health of the organisation's own employees.

Three figures summarise what the published material shows:

24 of 65

organisations document five governance requirements when the requirement points outward, to areas such as environment, quality and supply chains. They do not document the same five for their own employees' workplace health. None of the 65 shows the reverse pattern.

3.3 : 1

is the ratio of explicit documentation outward (45.9 per cent) to inward (13.8 per cent). The topic itself is mentioned about equally often in both directions.

0 of 65

have published a data boundary for individual follow-up, or an assessment of whether employee data can be traced back to individuals.

The gap lies in the documentation.

Mandate and evidence boundary

The analysis maps 1,193 public sources from 65 selected large organisations with a substantial Norwegian workforce, listed in the document manifest and retrieved up to 16 August 2026. The findings describe how verifiable governance is to an external reader of this material.

Implementation, control performance, actual practice, culture, competence, legal assessment and unpublished documentation sit with the organisations' own functions. The questions in this report are therefore framed so that those functions can answer them. The full boundary is set out in "About the analysis" at the end.

Summary

Five design principles, a control loop and three measures can close the gap.

The report proposes how organisations can close the gap: five design principles, a six-step control loop and three measures for arrangements (coverage, use and friction). With these, workplace health can be governed without the individual's health serving as the evidence.

In short

Measure the arrangement.

Why now

The timing makes the question pressing. Since 1 January 2026, employers in Norway must map psychosocial working-environment factors and assess the risks they may entail. The mapping and the risk assessment must be documented and form part of systematic health and safety work.

At the same time, the EU eased the framework for sustainability reporting through Omnibus I, in force in the EU from 18 March 2026. At the cut-off date, Norwegian implementation had been proposed in Prop. 106 L and was yet to be adopted. Omnibus I also widened the scope for omitting information, including on privacy grounds.

An organisation that wants to document without exposing its employees needs an architecture to build that documentation on.

Source universe

65 organisations, 1,193 sources in the manifest, 1,176 of them analysable.

PS65-2026-REPORT §§ 1-6, § 20

Cut-off date

The date up to which material is included in the analysis, here 16 August 2026.

More on regulation

Part 7 describes the two regulatory changes and the tension between them.

An organisation prevents harm only when its arrangements meet the need before a person has to explain themselves.

How to read this report

The text separates three kinds of statement.

Keeping them apart makes the findings stronger and the proposals more precise.

Signal in the text	What it means
Documented in the benchmark	An aggregated finding from the published material, with a source.
The report proposes	A design direction. It is not measured as fact. Where an interpretation goes beyond the coded material, the text says so.
To be confirmed internally	A question only the organisation can answer, using its own documents, systems and accountable roles.

The report is built to be used in three steps

Step	The question the organisation asks itself	What should happen
Recognise	Which gap in published documentation or control does the benchmark describe?	Treat the finding as a question for internal control.
Confirm	Which document, system, owner or control can answer the question internally?	Ask one accountable function to gather the documentation and set the context.
Decide	Should a specific arrangement be examined, changed or anchored in existing governance?	Agree owner, mandate, boundary and the date of the next review before anything is communicated externally.

For readers outside Norway. The benchmark covers organisations operating under Norwegian law. The Working Environment Act is the main occupational health and safety statute. Section 1A–2 of the Regulation on the Performance of Work, in force from 1 January 2026, requires employers to map and risk-assess psychosocial factors and document this in systematic health and safety work. Section 26 a of the Equality and Anti-Discrimination Act requires pay-mapping results to be reported in anonymised form. Datatilsynet is the Norwegian Data Protection Authority. The GDPR applies in Norway through the Personal Data Act. The occupational health service is the external or in-house occupational medicine function.

Unfamiliar terms are explained in the margin where they first appear, and collected in the appendix “Terms”.

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01

The question nobody can answer from memory

This part answers

Why is workplace health a governance question?

The question

What does the organisation need to know about a person?

The whole organisation

Workplace health reaches beyond HR

The hidden asymmetry

Outward governance is easier to see

1 · The question nobody can answer from memory

A system that measures its own coverage, use and friction moves responsibility to the organisation.

Most organisations can describe their values quickly. They can point to a health and safety policy, a whistleblowing channel, a sustainability report or a privacy notice. Many can also give their sickness absence rate, the number of reports received or the result of an employee survey.

Another question is harder:

What does the organisation actually need to know about a person before a workplace-health arrangement can work? And who owns that boundary?

The question concerns data, and it concerns power and design. In a reactive system, the individual often has to become visible as a problem before the system responds. The employee asks, justifies, explains, documents and waits. In a universally designed system, variation is assumed from the outset, and the arrangement is in place before anyone becomes a case.

The difference can sound like a nuance of values. In practice it is a difference in governance. A system that responds only once someone has disclosed something about themselves can place much of the cost of prevention on the person who already has a need. A system that measures its own coverage, use and friction moves responsibility to the organisation.

Term · universal design

Designing the workplace and its arrangements so that predictable variation is covered from the start (Working Environment Act, section 4-1).

Term · arrangement

What the workplace has in place for everyone, such as flexible hours, a rest room or a routine. *Adjustment* refers to the individual case.

Term · coverage, use and friction

Three measures of an arrangement. Coverage: who it is available to. Use: whether it is actually used. Friction: what stands in the way before it works.

1 · The question nobody can answer from memory

The same governance discipline is harder to see when the subject is the organisation's own employees.

Workplace health reaches across the organisation

Workplace health is often placed in a narrow space: HR, the occupational health service, sickness absence, health insurance or a themed week. That gives a distorted picture of where the problem sits. Workplace health affects how work is organised, who has access to resources, how risk is identified, what is reported, which information becomes necessary, and what the organisation can show it has under control.

When the topic shrinks to an individual need for support, the solution tends to become individual too. When it is understood as system quality, the question changes: is the workplace designed for the bodies, life stages and functional variations that are actually present?

Individual accommodation is still needed. Needs can be complex and urgent. The point is narrower: where variation is predictable, better design should meet it, so that individual explanation stops being the most common way in.

The hidden asymmetry

Organisations are used to governing risk outward. They set requirements for suppliers, document due diligence, set environmental targets, follow up on quality and define information-security requirements. In these areas, the owner, framework, review, resources and consequences are often visible.

The same discipline is harder to see when the subject is the organisation's own employees' workplace health. This hardly means the topic is unimportant to the organisations, or that they do not work on it. Even so, the published evidence of how governance works inward is consistently less detailed than the evidence of how it works outward. That is where this report begins.

Source

The directional asymmetry in the published material.

PS65-2026-REPORT § 9.2

02

What the figures show

This part answers

How large is the gap, and where does it sit?

The mirror matrix

Five requirements, two directions

The documentation

Mention and control

Traceability

The weakest dimension

2 · What the figures show

The requirement already exists and points mainly outward.

Same requirement, two directions

At the core of the benchmark is a *mirror matrix*: it tests the same five governance requirements in two directions. The five requirements are:

1. a named owner
2. a reference to an external standard or framework
3. a documented commitment of resources
4. management review or a review mechanism
5. a preventive design requirement

The codebook and the sources are the same in both directions. The only thing that changes is what the requirement applies to. Outward, it applies to areas that do not concern people, such as environment and supply chains. Inward, it applies to the organisation's own employees' workplace health. Because the requirements are identical, a difference between the directions cannot come from one requirement being stricter.

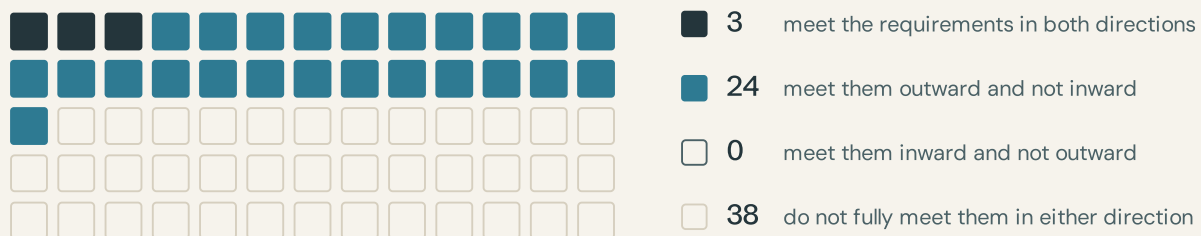
Term · mirror matrix

The method that tests the same five governance requirements in two directions, outward and inward.

PS65-2026-REPORT § 10

Figure 1 · The mirror matrix

24 of 65 organisations meet the five requirements outward and not inward. None shows the reverse pattern.



Each square is one organisation.

PS65-2026-REPORT § 10 · 65 organisations

2 · What the figures show

The gap opens in the step from mention to explicit documentation.

In the material reviewed, 24 of 65 organisations meet the five requirements outward and not inward. None of the 65 shows the reverse pattern. Three organisations meet the requirements in both directions. 38 do not fully meet them in either direction.

The figures say nothing about why the pattern arises. Nor do they establish whether the 24 have internal controls that are not published. What they show is a clear difference in what an external reader can actually verify.

The governance built for outward areas is therefore evidence of capacity. Organisations can make demanding matters visible, give them an owner and keep them under control. The task is to use that same capacity inward.

The difference lies in the documentation

It is easy to claim that “nobody talks about workplace health”. The benchmark shows otherwise. The topic comes up in 63.1 per cent of outward coding decisions and 61.3 per cent of inward coding decisions. When the analysis measures published and explicit documentation, the share is 45.9 per cent outward and 13.8 per cent inward, a ratio of 3.3 : 1.

Source

The mirror matrix.

PS65-2026-REPORT § 10

Term · coding decision

One assessment of whether a source covers an indicator. The benchmark rests on 1,300 of them.

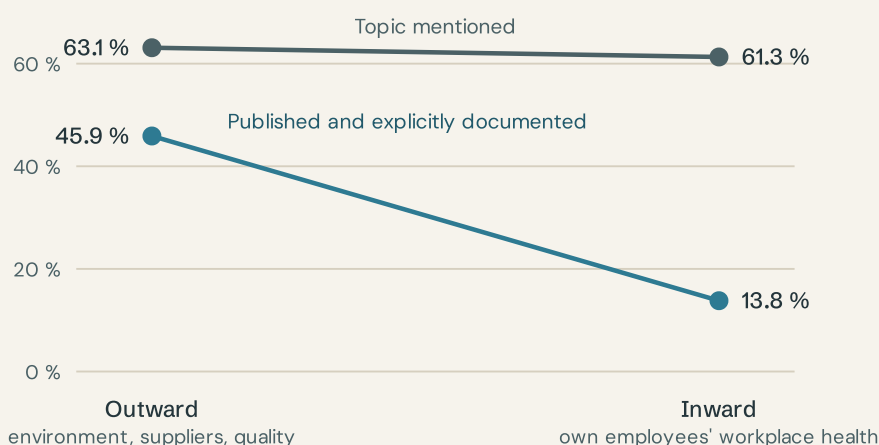
Term · explicit documentation

Published text that shows an owner, a method, a control or a review. A *mention* only names the topic.

PS65-2026-REPORT § 9.2

Figure 2 · Mention and explicit documentation

The topic is mentioned about equally often in both directions. Explicit documentation falls from 45.9 to 13.8 per cent.



PS65-2026-REPORT § 9.2 · share of coding decisions

3.3 : 1

explicit documentation
outward against inward

2 · What the figures show

Published control falls sharply once the topic has been recognised.

The difference matters. A mention can express ambition, values or attention. Explicit documentation makes it possible to check whether there is an owner, a method, a control loop, a regular review and a defined consequence.

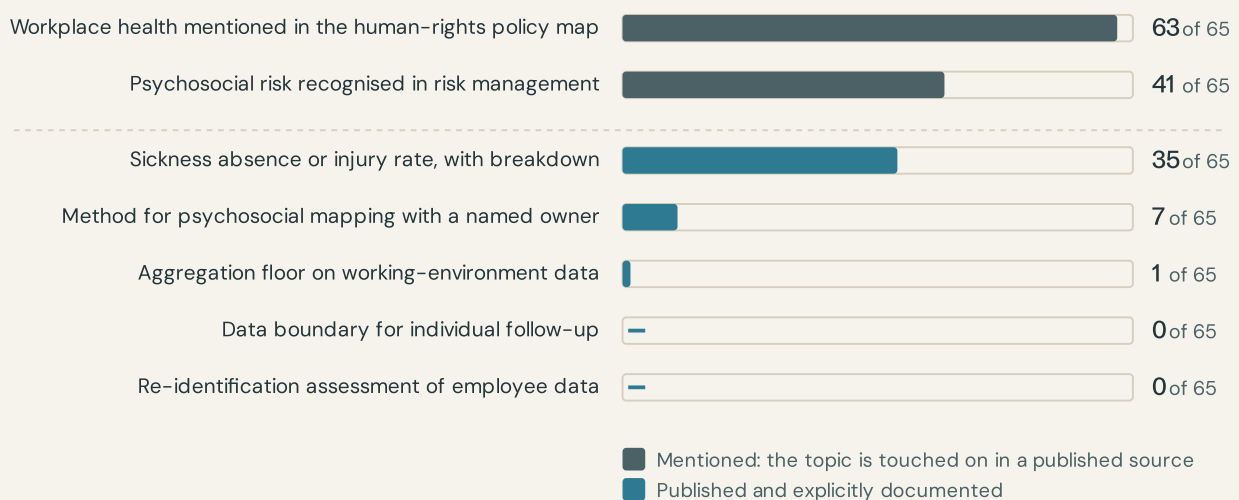
When a topic is mentioned	When a topic can be controlled
The ambition is visible.	Owner, framework, method and review are visible.
It is possible to agree.	It is possible to examine how the governance works.
Responsibility can stay dispersed.	Responsibility can be assigned and followed up.
The effect often has to be explained by individuals.	The effect can be documented as a property of the system.

Workplace health appears in the language of almost every organisation. What is harder to see is the control behind it. The benchmark shows a second movement: workplace health is mentioned in the human-rights policies of 63 of 65 organisations, psychosocial risk is recognised in risk management by 41, and sickness absence is published with a breakdown by 35.

After that, published control falls sharply. The choice of method for psychosocial mapping is explicitly documented by 7. One organisation has an aggregation floor for working-environment data. A published data boundary for individual follow-up, or a published assessment of re-identification risk in employee data, was not found in the material reviewed.

Figure 3 · The measurement-control ladder

The top two rungs measure mention. The five lower rungs measure published and explicit documentation.



2 · What the figures show

Traceability is the weakest dimension in the benchmark.

The zero findings should be read soberly. Internal assessments, data protection impact assessments (DPIAs) and guidelines may well exist. An external reader still cannot check whether a defined boundary exists, who owns it, or when it was last reviewed. The difference is whether the reader has to trust the governance or can verify it.

The benchmark measures governance across several dimensions. Two are particularly useful to compare. **Policy** (has the organisation published principles?) has a mean of 57.2 per cent, a median of 60 per cent and a range from 40 to 70 per cent, the narrowest range in the model.

Traceability (can a reader follow the principle to an owner, a control and documentation?) has a mean of 17.4 per cent, a median of 20 per cent and a range from 0 to 50 per cent. None of the 65 organisations scores above 50 per cent.

Term · data boundary

A visible decision about what a system needs to know in order to work, at which level and with which access.

Term · re-identification

When a person can be recognised in data meant to be de-identified, for example by combining several extracts.

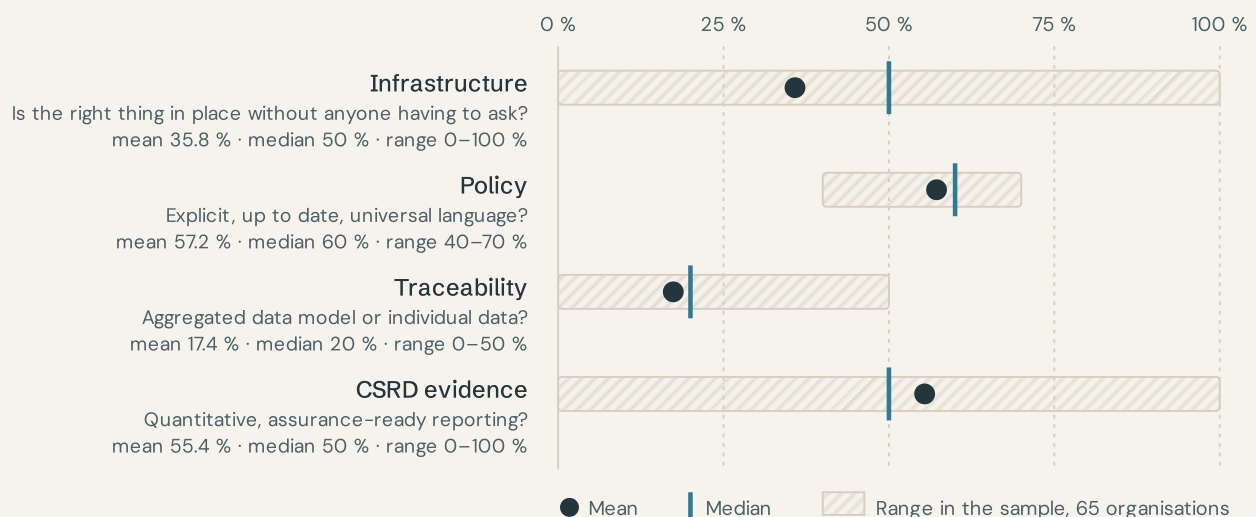
PS65-2026-REPORT § 12

Term · traceability

Whether an external reader can follow a principle through to its owner, its control and its documentation.

Figure 4 · The dimension profile

Traceability is the weakest dimension by a wide margin. Policy has the narrowest range.



PS65-2026-REPORT § 21.2

Policy work has value. Published control requires a separate step. The narrow policy range tells its own story: none of the 65 sits at the edges of the model. A pure policy project therefore improves the dimension where everyone is already clustered, and leaves the weakest dimension untouched.

2 · How the figures were checked

Every “published and explicit” finding rests on a verbatim quotation with its source.

Each quotation carries the document name, section and retrieval date.

1,193

sources listed in the document manifest. 1,176 could be analysed, 107.3 million characters in total.

1,300

coding decisions in the analysis.

26.2 %

of the decisions were coded twice, independently.

0.809

Cohen's κ : agreement between the coders.

The checks changed the figures

In one indicator, 82 of 96 machine-generated hits were false. The published figure is therefore 7. Without the check, it would have been 31.

Term · Cohen's κ

A measure of how far two independent coders agree, adjusted for agreement that could arise by chance. 1 means full agreement.

PS65-2026-REPORT §§ 1-6, § 20

03

Where arrangements stall

This part answers

What happens when a system only reacts once someone asks for help?

The reactive model

Six steps and four consequences

Three assumptions

What keeps the system in place

The design task

Knowing the right things

3 · Where arrangements stall

In the reactive model, the system's attention depends on whether the individual can make themselves visible.

The reactive model

A reactive model can look like this:

1. A need arises.
2. The employee notices it.
3. The employee asks for help.
4. The need is explained.
5. A manager or a function assesses the explanation.
6. The arrangement is put in place.

The organisation can use the model to read its own arrangements. In the model, the system's attention depends on whether the individual manages to make themselves visible. Anyone who has been through such a process knows the order: first the form, then the justification, then the wait.

That order can have four consequences the organisation should examine in its own setting:

- Prevention can come late.
- The need can become tied more closely to the person than to how the system is designed.
- Private information can feel like the price of access.
- The documentation can become fragmented. Individual cases and stories can show that something happened, yet say little about how the system was designed.

Reacting is right, and unavoidable, when the need is specific, rare or tied to a particular situation. The problem arises when the reactive model also becomes the default for variation the organisation could have foreseen.

The report proposes

The model is a tool for reading one's own arrangements. The boundary is set out in "About the analysis".

3 · Where arrangements stall

Three common assumptions keep the reactive model in place.

Assumption	Why it seems reasonable	What it overlooks
"A low threshold for speaking up is enough."	Openness and psychological safety matter.	Encouragement within a culture says little about which steps, explanations and waiting times the system actually requires.
"A policy shows the topic is taken care of."	Policies are visible signs of responsibility.	Without an owner, a control, data rules and a regular review, the policy becomes text without follow-up.
"Aggregation solves the privacy question."	Aggregated figures often reduce risk.	Small groups, combinable extracts, time series, free text and context can still make individuals recognisable.

The third assumption calls for the most precision. A minimum group size is one safeguard among several. In the material reviewed, published group thresholds come almost entirely from pay mapping, where organisations report in anonymised form under section 26 a of the Equality and Anti-Discrimination Act. They are practical measures in that setting and rest on no general privacy norm. A threshold has to be assessed together with purpose, access, linkage risk, combinable extracts and whether health information can in practice be inferred. See GDPR Article 4(1) and Article 9 on personal and health data, and Datatilsynet's guidance on anonymisation.

Source

Data boundary and privacy.
PS-METHOD-2026 § 3.3

Term · aggregation floor

The smallest number of people a group must contain before figures about that group are reported.

The real design task

To work better, the system needs to know the right things. The organisation has to distinguish between two kinds of data: data needed to offer, run and improve an arrangement, and data that only becomes available because the system is built around individuals explaining themselves.

This turns the question around. Organisations usually ask what a person must disclose to get an arrangement. The report proposes asking this instead:

What must the arrangement be able to do, so that the person can avoid explaining more than the situation actually requires?

That is universal design translated into the language of governance. Individual assessments remain necessary. They become more precise and less often the usual way in. They also become harder to misuse as hidden data collection.

04

Five design principles

This part answers

How can an organisation test whether its own principles also work inward?

The principles

Five control points

The principles already exist

Solution anchors in published material

The inward test

Five published principles

4 · Five design principles

Five control points test whether published principles work as strongly inward as outward.

The report translates the gap in the benchmark into five design principles. The principles are control points. An organisation can use them to test whether its published principles work as strongly inward as they do outward.

Principle	Design question	What it shifts
1 · Variation before deviation	Is the arrangement designed for predictable variation before anyone has to deviate from the norm?	From special arrangement to a fixed part of the workplace.
2 · Entitlement before explanation	Can someone gain access without first justifying a private reason?	From having to disclose to being able to use the arrangement independently.
3 · Data boundary before dashboard	Has it been decided what the system needs to know, at which level and with which access?	From privacy as an afterthought to privacy built in from the start.
4 · System evidence before individual case	Can coverage, use and friction be documented without the individual's health becoming the evidence?	From data about the individual to the quality of the system.
5 · Control loop before communication	Does the arrangement have an owner, a trigger, a control, a regular review and a visible consequence?	From ambition to practice that can be governed.

1 · Variation before deviation

A workplace should check whether its key arrangements assume that people must first deviate from the norm or explain a need. Universal design starts from the recognition that biological variation, functional variation and life stages are normal over a working life. The starting point is everyone, including those usually described as “vulnerable groups”. Solutions need not be the same for all. The system should still be built so that difference does not automatically become an exception.

A useful question is therefore: “What in our arrangement makes accommodation necessary before a need is known?” It yields more than asking “Who needs accommodation?”

The report proposes

The principles are design directions. The boundary is set out in “About the analysis”.

4 · Five design principles

A data boundary states, visibly and verifiably, what the system can do without.

2 · Entitlement before explanation

“Entitlement before explanation” is a principle of design and governance. An arrangement starts to resemble an entitlement when practical access depends as little as possible on courage, social capital, the relationship with one’s manager or a willingness to explain private matters. Availability on paper is not enough.

This is a question of power. When access depends on explanation, a disproportionate share of the practical burden can fall on the person who has the need.

3 · Data boundary before dashboard

Overviews, reports and insight come late in the design. Before anything is measured, the organisation must decide:

- the purpose
- who has access
- which levels are necessary
- which combinations of data create risk
- how the boundary is reviewed when the system changes

In practice, a data boundary means the organisation has decided, visibly and verifiably, what the system can do without in order to work. That is different from simply holding little data.

4 · System evidence before individual case

Individual cases can be important for understanding harm, friction and need. As the main evidence of whether a system works, they are weak. A system that works should be able to show that the arrangement reaches the people it is meant for, is available and is used. It should be able to show this without the individual’s reason becoming the evidence.

5 · Control loop before communication

Communication often comes first because it is visible and fast. Communication without a control loop can still open a gap between what the organisation says and what it can document about how the arrangement works. The text should therefore follow once the owner, trigger, boundary, control, review and corrective action have been set.

Term · data boundary

A visible decision about what a system needs to know in order to work, at which level and with which access.

Term · control loop

The sequence that turns a principle into governance: owner, arrangement, boundary, control, measurement, regular review and consequence.

4 · The principles already exist

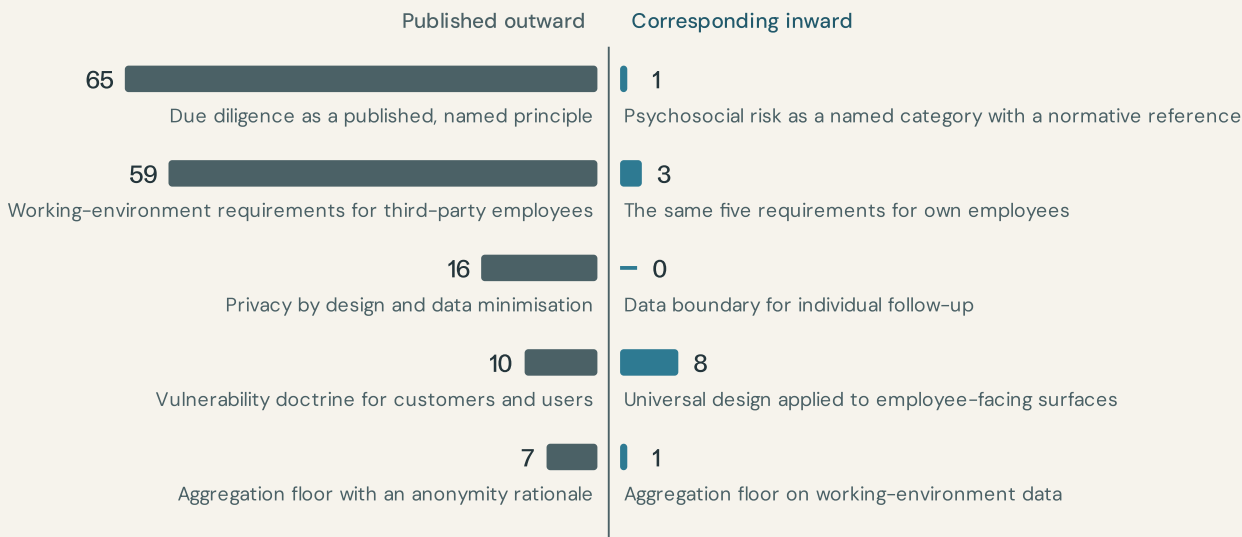
The requirement is already written, often most precisely in the organisations’ own supplier requirements.

The report introduces few new values. It shows how principles organisations have already published can be tested inward. In the benchmark, such *solution anchors* appear in due diligence, working-environment requirements for suppliers, vulnerability and accessibility principles for customers, privacy by design and aggregation rules. All are published. All are written in one direction.

Term · solution anchor
A principle the organisation has already published in one direction, and which can be applied inward.
PS65-2026-REPORT § 17

Figure 5 · The anchor gap

Five principles are published outward. The corresponding principle inward is rare.



PS65-2026-REPORT § 17 · number of 65 organisations

Two of the gaps stand out. **Due diligence:** all 65 organisations have published due diligence as a named principle. One of 65 names psychosocial risk as a category with a reference to a standard. **Working-environment requirements:** 59 of 65 set working-environment requirements for their suppliers’ employees, often explicitly covering psychosocial conditions. 3 of 65 have documented the same five requirements for their own employees.

4 · The principles already exist

The aggregation mechanism already exists and is rarely applied inward.

The gap that is easiest to act on concerns the aggregation floor. 7 of 65 have published an aggregation rule with an anonymity rationale, a defined threshold and a defined consequence. All seven concern pay mapping, where section 26 a requires results to be reported in anonymised form. One organisation has applied the same kind of rule to working-environment data.

Published principle	The inward test
Due diligence. Risk can be managed systematically and preventively.	Is psychosocial workplace-health risk named, owned and controlled as a risk?
Working-environment requirements for suppliers. Physical and psychosocial conditions can be turned into verifiable requirements.	Does the same documentation exist for the organisation’s own employees?
Universal design for customers. Accessibility can be built for variation without individual documentation.	Is the same design logic applied to systems and arrangements for employees?
Privacy by design. Data collection can be limited to a legitimate and necessary purpose.	What does the workplace-health system actually need to know in order to work?
Aggregation rules. Thresholds and consequences can be built into reporting.	Which limits protect employees when data is broken down or combined?

The most precise feedback to an organisation is therefore seldom “you need a modern solution”. More often it is: “you have already published a principle that can be applied inward more consistently”.

05

From person to arrangement

This part answers

What should the organisation measure, and which information can it do without?

The object of governance

From the person to the arrangement

The data boundary

Four levels

Three measures

Coverage, use and friction

5 · The new object of governance

Arrangements can be built into the walls, like electricity, ventilation and light.

Individual accommodation and universally designed arrangements work side by side. They answer different kinds of need. Individual accommodation deals with what is specific and tied to a particular situation. Universal design deals with what is predictable and structural. Put simply, the task is to build arrangements into the walls, like electricity, ventilation and light. Then they are already in place before anyone asks.

Figure 6 · The architecture model

The two tracks measure different things and produce different evidence.



Design direction · see "About the analysis"

The table below compares two design logics, as an organisation can test them in its own arrangements.

Design question	Individual accommodation	Universally designed arrangement
What is measured?	The person and the person's needs.	The arrangement and how it works.
What triggers the arrangement?	The individual asks and justifies.	The arrangement is available. Friction in access is measured.
Which data is most often collected?	Condition, cause, need and duration.	Coverage, use and friction at system level.
What does the organisation document?	An overview of who has which needs.	Evidence that the arrangement exists, is used and works.
What does it mean for dignity?	Support may require the individual to disclose.	Less need to explain private matters.
Can it be verified?	Difficult without information close to the individual.	Possible through system evidence, subject to a specific assessment of data and access.

5 · The data boundary

A data boundary has to be specific enough to govern practice.

Moving from person to arrangement is a matter of discipline. Unnecessary data about individuals should not become the automatic starting point for governance. Individual information must still be handled when the situation requires it. The system should be built so that it is needed only then.

A data boundary has to be specific enough to govern practice. It must answer:

- what is collected, and by whom
- for which purpose
- at which level, and with which access
- for how long
- which rules apply to combining data
- which control applies when something changes

Term · data boundary

A visible decision about what a system needs to know in order to work, at which level and with which access.

PS-METHOD-2026 § 3.3

Level	Question	The report's direction
The arrangement	Does the measure exist, and how is it designed?	Document properties of the system. The person's reason is not needed.
Aggregated use	Does the arrangement work over time and across relevant units?	Set extracts, group size, combination risk and access before anything is reported.
Individual follow-up	Which functional information is needed in the specific situation?	Limit collection, sharing and retention to what is necessary.
Cause and diagnosis	Does the arrangement really need to know the cause in order to work?	Keep cause out of the standard route in where access can be given without it.

Good intentions in the design say nothing about how the data should be classified. Raw data, logs and outputs must be assessed in their actual context. An event log can be personal data. A time pattern can reveal something in a small group. Several extracts that are harmless on their own can become problematic together.

In legal terms, the data boundary rests on these parts of the GDPR: purpose limitation and data minimisation (Article 5(1)(b)–(f)), legal basis and special categories (Articles 6 and 9), data protection by design (Article 25), security (Article 32) and, where high risk is likely, a data protection impact assessment (Article 35).

5 · Three measures of system quality

Friction measures the system where it meets people.

The report proposes three measures that make it possible to discuss workplace health as system quality: coverage, use and friction. They are a starting point for measurement. They help the organisation decide what it needs to show before it decides which data it needs.

Measure	What the organisation examines	What it makes visible	What it does not require
Coverage	Where does the arrangement exist, for whom, how available is it, and who owns it?	Whether the system is designed for predictable variation.	Information about diagnosis or cause.
Use	Is the arrangement actually used, measured at a defined and assessed level?	Whether availability and relevance are real.	Patterns close to the individual without a data boundary.
Friction	How many steps, explanations, waiting times, refusal points and obstacles come before the arrangement works?	Whether the threshold lies in the system or with the individual.	That “a low threshold” can stand as an ambition nobody checks.

Friction matters most because it makes a hidden threshold visible. In the material reviewed, numerical thresholds in a human context are almost always tied to pay, statistics and reporting duties. They are rarely tied to workplace health.

Emission limits are numbers because they measure a system. “A low threshold for speaking up” is harder to put a number on because it describes an attitude. Friction measures the system where it meets people. A person may hold back from asking for help for many reasons. The motive belongs to that person. What matters is what the system requires before help is available.

Term · coverage, use and friction

Three measures of an arrangement. Coverage: who it is available to. Use: whether it is actually used. Friction: what stands in the way before it works.

06

The control loop

This part answers

How does a principle become governance, and where do you start?

From principle to control

Six steps

Start with one arrangement

The sequence A to F

Six questions

Who owns the answer

6 · From principle to control

The control loop connects to the management systems the organisation already has.

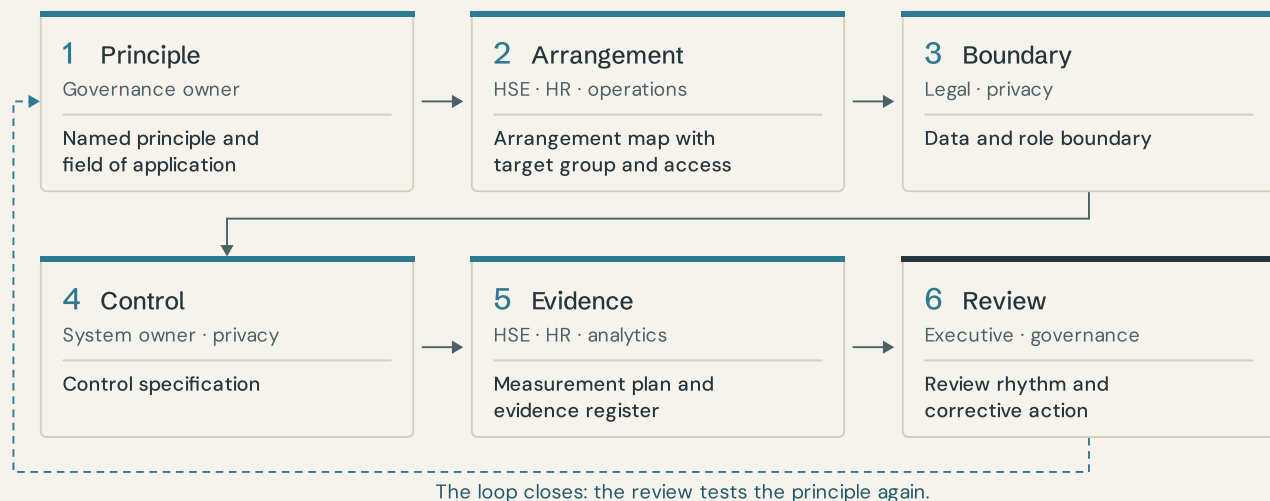
A principle becomes governance when it gains an owner, a defined arrangement, a boundary for data and roles, a control, a measurement, a regular review and a clear consequence when the control fails. This sequence is the report's control loop.

Term · control loop

The sequence that turns a principle into governance: owner, arrangement, boundary, control, measurement, regular review and consequence.

Figure 7 · The control loop

Six steps from principle to an arrangement that can be verified, each with a natural owner and first piece of documentation.



Design direction · see “About the analysis”

The control loop should connect to the management systems the organisation already runs. It builds on the lines that already exist. As a rule, nobody should set up a separate “workplace–health governance” alongside everything else. Find the policy, health and safety, risk, privacy or quality line that can own the improvement over time.

6 · Start with one arrangement

Choose one arrangement where needs today are triggered by explanation, negotiation or a manager's discretion.

It is tempting to start with a large programme. The report's advice is simpler and more demanding: choose one arrangement where needs are triggered today through explanation, individual negotiation or a manager's discretion. Then test whether that arrangement can be given a more universally designed way in.

Figure 8 · The implementation sequence

From local friction to system quality that can be governed, one arrangement at a time.

A Observe friction Where must an employee explain themselves today before support becomes possible?	Deliverable Friction map
B Delimit the arrangement What will the organisation actually make available?	Deliverable Arrangement definition
C Design the boundary Which data, roles and extracts are necessary?	Deliverable Data and role map
D Build the control How are unauthorised access and small-group exposure prevented?	Deliverable Control specification
E Measure the system What do coverage, use and friction look like at the right level?	Deliverable Measurement and evidence plan
F Make it visible What can be documented without exposing people?	Deliverable Governance statement

Design direction · see "About the analysis"

6 · Six questions nobody should answer from memory

Each answer should lead to a document, a system owner, a data map, a review date or a decision.

The questions below are not meant to be answered from memory.

-
- 1** Which boundary applies today to what is recorded when a manager follows up an employee about health or life stage? Who owns that boundary?
To: Legal and privacy

 - 2** Has anyone assessed whether working-environment surveys, free text or combinable extracts can be traced back to individuals in small units?
To: Legal and privacy

 - 3** Which information does the manager need in order to act responsibly? Which information should stay outside the manager's basis for decisions?
To: Health and safety, occupational health service

 - 4** Which arrangements require the employee to ask for something and justify the need? Which of them could be given a universally designed way in?
To: HR and operations

 - 5** Do we apply the same documentation discipline to workplace health as to environment, quality and information security? If not, what is the reason?
To: Board and executive management

 - 6** Which existing policy, control or review cycle should own the improvement, so that it does not become a time-limited HR project?
To: Owner of the management system

07

Why now

This part answers

What changed in regulation in 2026?

Norway

The documentation duty is tightened

EU

The reporting framework is eased

The tension

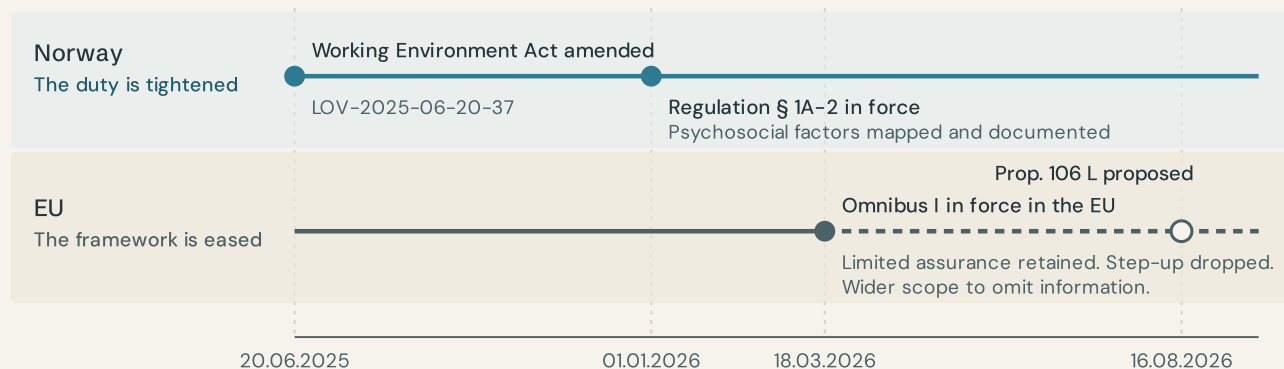
More documentation, more care with data

7 · Why now

Two regulatory changes now pull in opposite directions.

Figure 9 · Two regulatory changes in different directions

The national documentation duty is tightened, while the EU framework for reporting and assurance is eased.



Status as of 16.08.2026. Norwegian implementation of Omnibus I had then been proposed and was yet to be adopted.

Norway tightens the documentation duty. Since 1 January 2026, employers must map psychosocial working-environment factors and assess the risks they may entail. The mapping and the risk assessment must be documented and form part of the organisation's systematic health and safety work (Regulation on the Performance of Work, section 1A-2).

The EU eases the reporting framework. Directive (EU) 2026/470 (Omnibus I) entered into force in the EU on 18 March 2026. The directive keeps limited assurance and drops the planned step-up to reasonable assurance. Subject to conditions, it also widens the scope for omitting information that must be protected under other law or for reasons of a person's privacy or safety. As of 16 August 2026, Norwegian implementation had been proposed in Prop. 106 L and was yet to be adopted.

In the benchmark, 5 of 65 organisations report the ESRS S1 data points, the EU sustainability-reporting standard on own workforce, without using transitional provisions or omissions.

The result is a real tension. The organisation must document more about its psychosocial working environment. At the same time, it must clarify which data it can responsibly use. An arrangement that separates functional need from diagnosis, and measures coverage, use and friction at system level, can ease that tension. It can also provide a basis for the documentation.

Legal sources

Regulation on the Performance of Work, section 1A-2. Directive (EU) 2026/470. Prop. 106 L. Delegated Regulation (EU) 2023/2772 (ESRS).
Status as of 16.08.2026

08

Six objections, six answers

This part answers

What would a critical reader object to?

Practice

Accommodation, publication,
bureaucracy

Privacy

Group thresholds

Ownership

HR topic or technology

8 · Six objections, six answers

The objections point to the same answer: existing governance lines can be used more consistently.

“We already offer individual accommodation.”

That is good and necessary, and the report leaves it in place wherever it is needed. The question is whether the organisation also relies on individual accommodation where the need is predictable and shared by many. If everyone has to ask for the same thing each time, the organisation should ask whether the arrangement could be designed better.

“We cannot publish all our controls.”

Nor should any organisation. Full openness about internal processes, data and security measures would be impossible and undesirable. What can be shown is a credible control principle: what the arrangement covers, who owns it, which boundary governs data and access, and when the governance is reviewed. Such a statement can be short. The details stay internal.

“This will add bureaucracy.”

It can, if the control loop is laid on top of existing systems as a new reporting layer. The intention is the opposite: to use existing governance lines more consistently. The real test is whether the number of explanations, waiting times, ad hoc assessments and individual-level details the system requires actually goes down.

8 · Six objections, six answers

Workplace health is also a governance topic, and the technology follows the governance design.

“A group threshold protects anonymity.”

A group threshold can be an important safeguard among several. A small group can be easy to identify in context. A larger group can still become revealing when data is linked over time or with other extracts. The right question is therefore “Who can link what, with which access, and under which circumstances?” The size of the group is only part of the answer.

“This is an HR topic.”

Workplace health clearly has an HR and a health and safety side. When the topic involves risk, control, data, documentation, access, review and board reporting, it is also a governance topic. If the whole question is left to HR, the organisation risks designing the system without the involvement it needs from legal, privacy, operations, technology and management.

“This is really about technology.”

Technology can support an arrangement. Governance design comes first. A solution that collects data without a clear purpose, boundary, owner and control is no more responsible for being digital. The report therefore starts with the arrangement, the entitlement, the data boundary and the evidence the organisation needs. The technology comes after that.

Three questions for your own organisation

The report is most useful when it is brought into a single meeting.

Organisations have already shown they can govern demanding matters when the requirement is clear. They name who is responsible, use frameworks, commit resources, review regularly and set preventive design requirements. They do this for environment, quality, information security, supply chains and customers. The open question is whether the same governance is applied consistently enough to work where the organisation's own employees meet the system.

Bring the report into one meeting, together with three questions nobody should answer from memory:

- 1 What documentation can we show for how we govern psychosocial working-environment risk? Does it have a clear owner, assessment criteria, resources, a regular review and preventive measures?
 - 2 In pay mapping, results must be reported in anonymised form under section 26 a of the Equality and Anti-Discrimination Act. Which thresholds, limits on combination and access rules are responsible for our working-environment data, after a specific assessment of purpose and re-identification risk?
 - 3 Have we defined psychosocial risk as a category of its own in our risk management? If so, who owns it, which criteria are used, and when was it last reviewed?
-

When workplace health is designed as system quality, fewer people need to explain private matters. Dignity then becomes a property of the arrangement.

That is the requirement that turns inward.

About the analysis

Mandate, method and boundary

Mandate and evidence boundary

The analysis draws on 1,193 publicly available sources from 65 selected large organisations with a substantial Norwegian workforce, listed in the document manifest and retrieved up to the cut-off date of 16 August 2026. 1,176 of the sources could be analysed. The findings describe how verifiable governance is to an external reader of this material.

The report is a document-based governance analysis of published material on workplace health, universal design, data minimisation and governance. It is not an audit, certification, attestation, legal assessment or product specification, and it contains no claim that any requirement has been breached. All findings are hypotheses framed for internal control. It does not assess whether a named organisation complies with the law or has good internal practice. It is not a ranking, a sales tool or a commercial channel, and it does not call for any particular technology, supplier or implementation model. The findings concern differences in documentation. They are not about a lack of care.

The design principles, the control loop and the three measures are design directions. They are not legal requirements, technical specifications or maturity levels. "Entitlement before explanation" is not a free-standing legal conclusion about rights. The reactive model, the architecture model (figure 6) and the comparison of the two design logics are design hypotheses. They do not describe practice in any particular organisation. Specific data classification must always be assessed in its actual context, and the documentation basis must be assessed from a legal and privacy perspective in each organisation.

The report sets out how published principles can be applied more consistently inward. It offers a shared control language for boards, management, legal, privacy, health and safety, HR and the occupational health service, and a proposal for system design that each organisation must test in its own setting.

What the benchmark measures

The figures apply to the defined sample of 65 organisations and to the sources that were publicly available and included in the analysis on the cut-off date. The sample was not drawn at random and cannot be treated as representative of Norwegian business as a whole.

The analysis codes each finding in one of these categories: published and explicit documentation, mention without the necessary level of detail, not located, not assessable, and not relevant. The distinction between the last two is decisive. A source that exists but is technically inaccessible is never coded as a zero finding. That something is unpublished does not prove that the practice is absent internally. Nor does a published policy prove that the system works.

The pattern does not follow sectors. Neither sector nor ownership explains the distribution. The median lies between 3 and 5 core indicators met across listed, state-owned, municipal and cooperative organisations. The distribution of total indicator fulfilment is low and bell-shaped. That gives reason to examine whether there are shared structural explanations. The last sentence is an interpretation. It is not a coded finding.

PS65-2026-REPORT §§ 1-6, § 20

About the analysis

What the finding can support	The finding can support	The finding cannot support
	A verifiable difference in publication or level of detail.	A conclusion on whether the organisation complies with the law.
	A question about what should be confirmed internally.	A claim that internal practice or control is absent.
	A design hypothesis for how existing principles can be applied more widely.	A guarantee that a new system does not process personal data.
	An invitation to more precise governance.	A ranking of organisations or a purchasing decision.
	Nor can the finding support a claim that organisations are obliged to publish the controls examined, a conclusion that more public documentation is always desirable, an explanation of what causes the difference, a guarantee of anonymity, a lawful basis for processing or GDPR compliance, a conclusion that a particular group threshold is sufficient, or an assumption that the Omnibus I changes already apply as Norwegian law. Figures that concern one or a few organisations (<i>small cells</i>) must not be used to identify or assess individual organisations. The evidence register is not distributed with the report. Before publication, a “motivated reader” test was carried out: could a recipient who knows the sector link a rare finding to a single organisation?	

About the analysis

Edition status

The central claims have been checked against the evidence package, and editorial corrections have been made. All five pre-publication gates were closed on 19 August 2026. The edition is activated for internal use and for sharing with partners and advisers. Public distribution is decided channel by channel. Use in CRM or commercial settings is decided separately.

Gate	Status
Source identity	Closed 19.08.2026. The evidence matrix is hash-verified against the original delivery. The published figures have been reproduced with the same result, and the links between the claims register and the sources have been checked.
Independent review	Closed 19.08.2026. A second reviewer with a legal and privacy background, together with a joint review, tested the claims, boundaries and effect on readers. Version r4 was approved.
Production	Closed 19.08.2026. The final export has been checked against the publication guide.
Language	Closed 19.08.2026. Channel texts have been checked against the claims register and the sharing rules. The design principles have not been turned into absolute regulatory claims.
Distribution	Closed 19.08.2026. The “motivated reader” test for small cells has been carried out and documented. The first sharing channel (partners and advisers) is approved with fixed sharing rules.
Edition 1.1	This English edition, 27.09.2026, is written from the Norwegian edition SYD-GB-01-NB (edition 1.1, 25.09.2026) following Sydera’s language and report standard. Figures, findings and sources are unchanged. Where the two editions differ, the Norwegian edition prevails.

About the analysis

Use and responsibility

The report offers no shortcut around law, privacy or professional judgement. It offers a design question that brings those functions in earlier, before the system is locked into the individual as its data source.

The report does not replace legal advice, audit, attestation, a data protection impact assessment or the organisation's own health and safety work. Decisions on data classification, processing, access, retention, working-environment measures and legal basis must be assessed in their actual context by the organisation's own accountable functions.

The analysis rests solely on what the organisations have published themselves. An external reading does not replace internal audit or the organisation's own controls. It adds to them by showing what an external stakeholder can verify in published material.

Figures

Figures 1–5 and 9 are generated directly and reproducibly from the benchmark data and the legal sources. Figures 6–8 show design directions. The conceptual illustrations IO1–IO4 from edition 1.0 are not included in this edition. No stock photography or images of identifiable employees are used.

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SYD-GB-01-EN · edition 1.1 · 27.09.2026 · manifest PS65-2026-REPORT

Appendix · Terms

Fifteen terms used throughout the report.

Aggregation floor (group threshold)	The smallest number of people a group must contain before figures about that group are reported.
Arrangement	What the workplace has in place for everyone, such as flexible hours, a rest room or a routine. <i>Adjustment</i> refers to the individual case.
Coding decision	One assessment of whether a source covers an indicator. The benchmark rests on 1,300 of them.
Cohen's κ (kappa)	A measure of how far two independent coders agree, adjusted for agreement that could arise by chance. 1 means full agreement.
Control loop	The sequence that turns a principle into governance: owner, arrangement, boundary, control, measurement, regular review and consequence.
Coverage, use and friction	Three measures of an arrangement. Coverage: who it is available to. Use: whether it is actually used. Friction: what stands in the way before it works.
Cut-off date	The date up to which material is included in the analysis, here 16 August 2026.
Data boundary	A visible decision about what a system needs to know in order to work, at which level and with which access. Everything else stays out.
Explicit documentation	Published text that shows an owner, a method, a control or a review. A <i>mention</i> only names the topic.
Mirror matrix	The method that tests the same five governance requirements in two directions, outward and inward.
Re-identification	When a person can be recognised in data meant to be de-identified, for example by combining several extracts.
Small cell	A figure that concerns one or a few organisations and could therefore point to a single organisation.
Solution anchor	A principle the organisation has already published in one direction, and which can be applied inward.
Traceability	Whether an external reader can follow a principle through to its owner, its control and its documentation.
Universal design	Designing the workplace and its arrangements so that predictable variation is covered from the start (Working Environment Act, section 4-1). <i>Accommodation</i> is the individual duty that applies when that is not enough.

Sources

The sources are held in Sydera's document manifest and evidence archive.

Source ID	Title	Status in this edition
PS65-2026-REPORT	Sydera Aggregated Policy Scan, 65 organisations. Cut-off 16.08.2026.	Source package v1.1 and internal report text v1.0 reconciled with the current versioning. The source-identity gate was closed on 19.08.2026.
PS-METHOD-2026	Policy Scan, methodology and scoring. Internal method v2.0.	Internal working reference, used for precision in method and language.

References in the text

Source	Used for
PS65-2026-REPORT §§ 1-6, § 20	Sample, source universe, cut-off date and quality assurance.
PS65-2026-REPORT § 9.2	The directional asymmetry, clarified. Mention and explicit documentation.
PS65-2026-REPORT § 10	The mirror matrix: governance outward and inward.
PS65-2026-REPORT § 12	Measurement capacity, data boundary and re-identification.
PS65-2026-REPORT § 17	The solution anchor in the organisations' own principles.
PS65-2026-REPORT § 21.2	Dimension mapping.
PS-METHOD-2026 § 3.3	Data boundary and privacy. Legal basis: GDPR (Regulation (EU) 2016/679, implemented in Norway through the Personal Data Act, LOV-2018-06-15-38), Article 4(1) and (15), Article 5(1)(b)-(f), Articles 6, 9, 25, 32 and 35. Datatilsynet's guidance on anonymisation of personal data.

Legal sources

LOV-2005-06-17-62 (Working Environment Act), LOV-2025-06-20-37, Regulation on the Performance of Work FOR-2011-12-06-1357 section 1A-2 (added by FOR-2025-12-16-2615), LOV-2017-06-16-51 section 26 a (Equality and Anti-Discrimination Act), LOV-2018-06-15-38 (Personal Data Act and GDPR), Directive (EU) 2026/470 (Omnibus I; Norwegian implementation proposed in Prop. 106 L and yet to be adopted at the cut-off date), Delegated Regulation (EU) 2023/2772 (ESRS). Status as of 16.08.2026, corrected after independent review on 19.08.2026.

The report refers to source IDs. File paths are left out, so that internal working files do not appear to be available to the reader.

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