

Occupational Health and Safety Reports: A Comparative Study between Malaysia and the United Kingdom

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ABSTRACT

Occupational health and safety reporting (OHS) is important for the evaluation of business risk as well as representing the commitment of the reporting companies to their stakeholders which in turn enhance companies' images. The evidences of OHS reporting practices can be found in prior studies that exist in the literature of corporate social reporting, intellectual capital reporting and risk reporting. However not much can be understood from prior studies as the extent to which OHS index reporting captured was somewhat limited. Therefore, an exclusive OHS reporting study that apply more comprehensive index of reporting would ensure the far-reaching of its understanding. This index was applied in content analysis of corporate annual reports for financial year ended 2014. The objective of the study is to compare the practices of OHS reporting by 40 Malaysia companies against 40 companies from so-called reporting leading country such as the United Kingdom (UK). The findings are expected to be indicative of current practices of such reporting as well as to propose the area of improvement. In the absence of reporting guidelines, the study's findings suggest that the OHS reporting practice in Malaysia is comparable to the UK. In some reporting items, Malaysia companies report even more than the UK companies. However, Malaysia companies are suggested to increase financial-based OHS reporting as they are behind their counterparts in the UK. This study is consistent with Stakeholder Theory where reporting companies not only perform OHS work as a mean to discharge its accountability but they also use annual reports as a method of accountability information conveyance.

Keywords: Occupational health and safety reporting; annual reports; content analysis; stakeholders' theory

INTRODUCTION

Occupational health and safety (OHS) is defined in many ways (WHO 2001; O'Neill 2010; Koskela 2014). In general, the definition covers the practices of protecting employees from various risks. Good OHS management is considered to reduce potential loss cost and risk of accidental in workplaces which lead to the better financial performance of company (Fernández-Muñiz, Montes-Peón, & Vázquez-Ordás 2009). Accordingly, information related to OHS might be relevant for economic decision making. The relevance of the information can be seen from the perceived commitment of reporting companies that investor might associate with employment environment (Koskela 2014). Abeyunga, Clevenstine, Morgan et al. (1998) mention that the OHS policy, programs and guidelines can be made explicitly known to employees and labour unions through OHS reporting. In addition, performance of OHS has to be visible and traceable through external reporting so that the OHS compliance can be checked and audited by relevant regulators (Brown & Butcher 2005). From corporate reporting point of view, annual reports can lessen information asymmetry in regards with OHS issues between company and stakeholders (O'Neill, Clarke & Flanagan 2010). Having external OHS reporting in corporate communication is a good practice because it demonstrates company's commitment and transparency to stakeholders.

The present rules and regulations in Malaysia do not specifically deal with OHS external reporting. The listing requirement by Bursa Malaysia under Circulation 5/2013 Best Practice of Business only requires disclosure about social responsibility without spelling out in detail the requirement OHS information reporting. The Employee Safety and Health Act 1994 and Petroleum Act 1994 has also no ruling about external OHS reporting at all. United Kingdom however has leapt forward in the OHS reporting issue. The Institution of Occupational Safety and Health (IOSH) in the UK introduce *Reporting Performance: Guidance on Including Health and Safety Performance in Annual Reports* in 2015. The document outlines three levels of OHS reporting namely a) level 1- the minimal health of safety reports in a section of annual report; b) level 2 – comprehensive internal reports; and c) level 3 – external reports as a stand alone reports like CSR reports. All organisations are aimed to aspire to the level 3 reports. This guideline is thought to has augmented the practice of OHS information reporting in the UK more than other unguided countries like Malaysia. Therefore, it is expected that Malaysia OHS reporting practice is lower than the UK. Nonetheless, the practice of the OHS reporting in Malaysia has not been investigated so far. The position of Malaysia in this respect is remained unanswered. As such, a comparative analysis between Malaysia and a benchmark country like UK is required so that identification and

improvement of any deficiency of the reporting practice in Malaysia can be made.

In addition, the lacuna of past OHS reporting studies is also lies on the wholeness of OHS index captured. It has been identified in the previous studies that OHS disclosure items only formed a minor part of total disclosure index in corporate social responsibility reporting, intellectual capital reporting and risk reporting (e.g Ali & Taylor 2014; Alvarez Dominguez 2011; Campbell & Rahman 2010; Gamerschlag, Möller, & Verbeeten 2010; Hemrit & Arab 2011). Therefore, the depth and breath of OHS information reporting demonstrated in the previous studies is almost unknown, thus no complete understanding of the reporting practice can be obtained. The inclusion of more comprehensive index of OHS reporting in the current study would ensure the far-reaching of its understanding. Whilst there are few specific OHS reporting studies have been conducted such as O'Neill (2010) and Koskela (2014), no similar studies have been conducted in Malaysia so far, specifically from the comparison context with leading reporting country. The lack of awareness among corporate reporting researchers about OHS incidents in Malaysia might has contributed to the lack of interest to carry out such study.

Hence, steered by stakeholder theory, this study aims to compare OHS information reporting in corporate annual reports of Malaysia companies against the companies in the UK. Content analysis technique was applied over 40 annual reports of the both countries respectively. The findings of this study are expected to be partly indicative for future extended studies to measures and practice of OHS reporting in Malaysia that using large sample size.

OCCUPATIONAL HEALTH AND SAFETY

World Health Organisation (2001 pg.13) defines OHS as protection and promotion of the health of workers by preventing and controlling occupational diseases and accidents and by eliminating occupational factors and conditions hazardous to health and safety at work. Whilst, British Standards Institution describes OHS as any conditions and factors that may affect workers, visitors and other human that present in the work place (Koskela 2014). It has been argued that workplaces accidents, injuries and diseases have long been a cost for human, social and economic which detriment company and national interest. Montero, Araque, and Rey (2009) notes that many workers all around the world are unconsciously exposed to the health risk such as dangerous dust, smoke, noise and heat. There have been many policies, guidelines and action is designed to prevent, control, reduce or eradicate occupational hazards and risk. Yet, despite various strategies have been taken, occupational accidents and diseases continues to increase and its cost in aspect of mental suffering and economic burden have been agonising.

In the UK, Health and Safety Executive informed that in 2015/2016, there were 1.3 million workers suffering

from work-related illness, 137 workers killed at work and 621,000 injuries occurred at work. In addition, there were also 2,542 mesothelioma deaths due to past asbestos exposures. Consequently, there were 30.4 million working days lost due to work-related illness and injuries. The total economic cost incurred was significant accordingly where £9.3 billion and £4.8 billion were incurred on work-related illness and injuries respectively (Reporting Performance: Guidance on Including Health and Safety Performance in Annual Reports 2015), Meanwhile in Malaysia, Social Security Organisation (SOCSO's Annual Report 2014) reported that there were 63,331 work-related accidents occurred during 2014 or on average 17 accidents per day. The figure comprises of 55.7% in work-place accidents and the remaining 22.3% is related to work commuting. Malaysia Health and Safety Report 2014 published by Malaysia Ministry of Human Resources demonstrated that in 2014 there were 42,148 cases related to OHS issues but only 2,808 were completely investigated. Out of this figure, 145 cases caused permanent disabled and another 207 cases caused death.

The increasing number of OHS related accidents as mentioned above might encourage poor perception towards companies. Stakeholders may perceive sufficient measures have not been implemented to mitigate OHS problems. As a result, company is likely to be seen as irresponsible and risky company. In encountering this issue therefore, company not only has to properly incharge the OHS management but also must be perceived as doing so. It is thought that information related to OHS has to be externally reported through annual report so that all problems associated with OHS has been appropriately addressed (Koskela 2014; O'Neill 2010). It is argued that the external reports capable to reduce information asymmetry and give opportunity for risk analysis over reporting company in relation to OHS issues which at the end would polishing the company's reputation.

PREVIOUS STUDIES ON OHS REPORTING IN CORPORATE ANNUAL REPORTS

Previous studies that captured OHS information reporting usually fall under the stream of corporate social reporting (Branco & Rodrigues 2006; Gamerschlag, Möller, & Verbeeten 2010; Gunawan 2010; Hamid & Atan 2011), a bit in intellectual capital reporting (Beattie & Thomson 2007; Campbell & Rahman 2010; Wagiciengo & Belal 2012) as well as risk reporting (Abdullah, Shukor, Mohamed et al. 2015; Hemrit & Arab 2011; Rajab & Handley-Schachler 2009) as shown in Table 1.

Gamerschlag, Möller and Verbeeten (2010) in Germany and Gunawan (2010) in Indonesia only included two items of OHS in their corporate social responsibility reporting studies. The limited key words of OHS used in the content analysis procedure of the previous studies suffer exhaustiveness of the topic. As a result, little findings and discussions that can be drawn from these studies. This deficiency is also apparent in the past intellectual capital reporting studies.

TABLE 1. Inclusion of OSH items in the previous studies

Studies	Focus area	Country	No. of OHS captured
Mahadeo, Oogarah-Hanuman, and Soobaroyen (2011)	CSR	Afrika	1
Gamerschlag, Möller, and Verbeeten (2010)	CSR	German	2
Gunawan (2010)	CSR	Indonesia	2
Hamid and Atan (2011)	CSR	Malaysia	2
Branco and Rodrigues (2006)	CSR	Portugal	2
Beattie and Smith (2010)	IC	United Kingdom	1
Campbell and Rahman (2010),	IC	United Kingdom	1
Wagiciengo and Belal (2012)	IC	South Africa	2
Roslender, Stevenson, and Kahn (2006)	IC	United Kingdom	-
Rahman, Ahmed, and Hassan (2017)	HC	Malaysia	1
Linsley and Shrivs (2006),	RR	United Kingdom	1
Rajab and Handley-Schachler (2009)	RR	Malaysia	1
Hemrit and Arab (2011)	RR	Tunisia	1
Amran, Rosli, and Mohd Hassan (2008)	RR	Malaysia	1
Ali and Taylor (2014)	RR	Malaysia	-
Lajili and Zéghal (2005)	RR	Canada	-
Chan (1979)	OHS	USA	27
Tilling (2003)	OHS	Australia	-
Koskela (2014)	OHS	Finland	35
O'Neill (2010)	OHS	Australia	29

Beattie and Smith (2010) and Campbell and Rahman (2010) for example included only one item of OHS information under human capital information category and the both studies draw no material discussion about it. Furthermore, under risk reporting study, Ali and Taylor (2014); Amran, Rosli, and Mohd Hassan (2008); Linsley and Shrivs (2006); Rajab and Handley-Schachler (2009) categorised OHS information as operational risk information. Similarly, these studies also lack of exhaustiveness in respect of OHS information being captured which only taking into account one item.

The first attempt to discover OHS reporting practices was conducted by Chan (1979) over Fortune 500 companies in USA. They study content analysed OHS information in 102 annual reports and found that 80% companies did not report the information. Tilling (2003) investigated factors that determining OHS reporting. The study found that 85% of 201 annual reports contained information about OHS and the results also reveal that numbers of employee did not influence the amount of OHS reporting. The study concludes that OHS reporting was not considered as effective communication tool with employee.

In another exclusive study of OHS disclosure, Koskela (2014) divided the disclosure into three broad categories namely occupational health, occupational safety and well-being at work. A total of 35 sub-area of OHS information fall under these three categories. The information was captured in annual reports of three OHS-sensitive case industries in Finland namely aviation, energy and financial industry. The annual reports covers over five years of reporting periods from 2007 to 2011, making total annual reports being analysed were 15. Overall, the total pages covered OHS information ranging from 0 to 11 pages. Over time, there were an increasing number of pages

devoted to OHS information. Fortum companies (energy industry) for example, addressed 3 pages of OHS issues in 2007 and increased to 11 pages in 2011. Comparatively, Fortum company was highest reporter over the 5 years with 24 pages, followed by Finnair (aviation) 21 pages and Tapiola (financial) only 11 pages or 10% of total annual report space. At sub-categories level, the study found a sum 291 OHS issues were mentioned in all annual reports and the most mention were issues in respect of ability to work, occupational healthcare, safety indicators, safety development, well-being project and well being survey. Only a few monetary aspects of OHS were mentioned.

The recent study in Malaysia that closely related to OHS information was conducted by Rahman, Ahmed, and Hassan (2017) under the framework of human capital information reporting. The study content analysed 192 annual reports from 48 companies for the financial year 2010 to 2014 to examine the influence of unionization and government factors over the human capital information. It was found that the total OHS reporting was 233 themes or 7% of total human capital reporting. The study also discovered that the both factor affected the level of reporting including information about OHS.

This current study has been conducted to seal the two gaps. Firstly, the inclusion of OHS information items in the disclosure check list that found in majority of previous studies was not overwhelming which only accounted for one or two items. Not much can be understood from the findings of previous studies about OHS reporting practices excepting from only few specific OHS reporting studies such as O'Neill (2010), Nuñez and Villanueva (2011) and Koskela (2014). Secondly, as far as this study is concerned, no exclusive OHS reporting studies have been conducted from Malaysia perspective and therefore, the practice of

OHS reporting in this country has been undiscovered. The position of OHS reporting in Malaysia as comparison with other leading voluntary reporting country has also not been examined as well.

THEORY OF STAKEHOLDERS

The OHS disclosure practice is argued to be driven by pressure and approval from stakeholders including from employee and labour unions. Guthrie, Petty and Ricceri (2006) stated that undertaking activities and reporting on those activities back the stakeholders must be in tandem. They furthermore added that stakeholder theory highlights organisational accountability beyond simple economic and financial performance. This study also follows this line of thinking which excerpt that the accountability of organisation is not limited to maximising the well-being of shareholders. Rather, the organisation must also be able to meet and account for the multiple goals of diverse stakeholders. Likewise, Gray, Kouhy, and Lavers (1995) remarked that the more powerful the stakeholders, the more the organisation must adapt their activities to comply with those stakeholders. The organisation has an obligation to provide information about how its activities affect the stakeholders. With regard to OHS reporting, it is argued that organisations form a part of broader social system. It is important for organisations to be accountable to the various groups of stakeholders including employee and labour unions. Therefore, OHS reporting is considered to be an effective means of discharging accountability by conveying OHS-related information that could improve relationships with employees (O'Neill 2010).

RESEARCH METHOD

A total of 40 largest companies was selected from the Bursa Malaysia and London Stock Exchange based on top market capitalization respectively (see Appendix A). The match-pair industry was impractical owing to the different classification of industry between two stock exchanges. Annual reports for the year ended 2014 of these companies were downloaded. While it is acknowledged that other kinds of corporate documents may be important (Castelo Branco, Delgado, Sousa et. al 2011; Striukova, Unerman & Guthrie 2008), annual reports were chosen on the ground that it is the only type of document produced on a regular basis (Campbell and Rahman, 2010). These reports are also considered to be influential sources of information for various stakeholders. Furthermore, annual reports can be used as single proxy for a wider range of corporate reporting intent as previous studies show that amount of disclosure in annual reports were positively correlated with other media (Khaled & Khaled 2007; Saverio, Francesco & Federica 2003). Campbell (2004) noted information in annual reports are partly prepared with a high degree of discretion and are editorially controlled by company management. Hence, management concerns, interests, attitudes and policies are thought to be well-reflected in

annual reports. Therefore, it is assumed in this study that OHS information is certainly obtainable in annual reports. Content analysis technique was applied in this study to capture OHS information. Themes or clause was determined as text unit of analysis in order to facilitate inference of meaning and also to resolves problems of mutual exclusiveness. A theme does not exist in a word, sentence or paragraph but its existence rather lies between the beginning and end of a discussion without being restricted to punctuation. Read between the lines is important in identifying themes (Beck, Campbell & Shrives 2010; Campbell & Rahman 2010; Mat Husin, Hooper, & Olesen 2012). The study applied volumetric method to count information content. It refers to the method that counts the repetition information. The method is defensible given that it signify the importance message attached to it (Abhayawansa & Abeysekera 2009; Beattie & Thomson 2007). There were 10 annual reports involved in the training stage of analysing contents between two coders to ensure reliability and consistency, all of which were excluded in the final sample analysis.

In order to increase comparability between studies, it is important to use a framework that has commonly been employed in reporting of OHS studies. This approach was also recommended by Carley (1993), who noted that the construction of information categories is usually based on those developed by previous researchers. This study therefore, used OHS reporting index developed by O'Neill (2010) as shown in Table 2. The index was chosen on the reason that it is the most comprehensive OHS reporting to date. There are 21 coded OHS information categories where 8 items related to financial and 13 items are non-financial. Christian and Jan (2008) agreed that the disclosure in the form of financial data is the best indication of the importance placed on the information, since preparing financial hard data requires more resources than providing qualitative information. Tsang (1998) believed that financial information is the best signal of information as it reflects the actual activities and amount of efforts taken by companies. Quantitative terms such as numerical and financial measures are also considered to give more value to users (Jean 2007; Kang & Gray 2011).

There was no systematic inter-coder reliability and consistency test was conducted on content analysis. However, this study believes that reliability and consistency of coder is sufficient by having specific rules of disambiguation during the training stages. This method is defended by Guthrie, Petty, Yongvanich et al. (2004) who stated that robust instruments are more reliable than conducting inter-coders test. Therefore, the reliability of content analysis in this study was assumed to have been reasonably assured by establishing clear and specific coding scheme during training session.

RESULTS

Table 3 shows the overview of the data analysis. A total of 10,401 pages of Malaysia companies' annual reports and

TABLE 2. OHS Reporting Index

Code	OHS Description
Financial-based	
FI1	Employee accidental compensation
FI2	Fines and penalty
FI3	Cost of OHS training and awareness program
FI4	Employee rewards and bonuses on OHS practices
FI5	Directors rewards and bonuses on OHS practices
FI6	OHS budgets
FI7	OHS system cost
FI8	OHS audit, investigation and monitoring cost
Non-financial based	
NFI9	Accident (Death, injuries and diseases)
NFI10	Employee permanent disabled
NFI11	Employee temporary disabled
NFI12	Sexual harrasment
NFI13	OHS training and induction
NFI14	Healty and safely workplaces
NFI15	Employee facilities
NFI16	Medical assistances
NFI17	Audit, investigation and monitoring
NFI18	OHS policies
NFI19	OHS committee
NFI20	OHS awards
NFI21	OHS program for employee and society

FI – Financial-based information. NFI – Non Financial-based information

9,244 pages for UK's companies were extensively content analyzed. Overall, Malaysia companies report slightly higher than the UK companies. The study found 829 OHS themes were disclosed by Malaysia companies compared to 728 themes by the UK companies. In average, Malaysia's companies disclosed 21 OHS themes in per annual report which is slightly higher than the UK companies that disclosed 18 informations per annual report. In term of characteristic information, the companies from both countries predominantly addressed non-financial based than financial-based disclosure. Financial-based disclosure comprising more than 90% of total disclosure in the annual reports in the both countries. The UK companies presented more financial-based OHS information only 34 themes or 4.7% while Malaysia companies recorded even lower, only 7 themes or 0.8%. Following are some examples of the OHS information disclosed in annual reports:

During 2014, four sites received fines totaling £31,000 for breaches of safety regulatuions which is a reduction of 29%. All business are required to report to the group when and how remedial actiosn are implemented.

Associated British Food Plc's annual report, 2014

Two (2) reported case of discrimination/harassment in 2014 (one (1) for discrimination and one (1) for sexual harassment). Investigation done and one action of dismissal was taken.

Nestle (Malaysia) Bhd Group's annual report, 2014

We made further progress in installing world-class management systems aligned to the national occupational health and safety management standard OHSAS 18001 across our manufacturing operation. Five additional sites in Chad, the Philippines, Ivory Coast and Morocco were certified as having reached this standard during the year.

Imperial Tobacco Plc's annual report 2014

During the year, Digi strengthen governance of the health and safety of workers in our supply chain, especially those working on base stations, roof tops, and close to roads. A Health, Safety and Enviroment (HSSE) Governance Committee comprising the Chief Executive Officer, Chief Operating Officer and Human Resource Officer was established to review policies.

Digi. Com Bhd's annual report, 2014

As shown in Table 4, a total of 1,557 themes of OHS information were found from the annual reports of the both countries. The most popular OHS disclosure themes for the both countries occur in the area of OHS policies (NFI18 – 576 themes), OHS programme for employee and society (NFI21 – 292 themes), accident (NFI9 – 223 themes), OHS training and induction (NFI13 – 104 themes) and OHS audit, investigation and monitoring (NFI17 – 76 themes). Meanwhile the least popular OHS disclosure themes can be found in the area of employee temporary disabled (NFI11 – 1 themes), sexual harassment (NFI12 – 1 themes) and employee permanent disabled (NFI10 – 2 themes). Meanwhile, none of reporting was found in the area cost of OHS training and awareness program (FI3), OHS budget (FI6) and OHS audit, and investigation and monitoring cost (FI8) from the both countries.

The UK companies show higher quality of OHS disclosure when they more associating financial data in OHS information compared to Malaysia Companies. The higher quality of reporting from the UK companies can be described in the area of directors rewards and bonuses

TABLE 3. Overview of OHS information in Annual Reports

Country	Total No.of annual reports	Total No. of pages	Total frequencies of disclosure	Average disclosure per annual report	Financial based	Non-financial based
Malaysia	40	10,401	829	21	7 (0.8%)	822 (99.2%)
United Kingdom	40	9,244	728	18	34 (4.7%)	694 (95.3%)
Total	80	19,645	1,557	39	41	1,516

on OHS practices (FI5 – 17 themes), employee incidental compensation (FI1 – 6 themes), employee rewards and bonuses (FI4 – 6 themes), fines and penalty (FI2 – 4 themes) and OHS system cost (FI7 – 3 themes). However, Malaysia companies only address 2 themes in employee incidental compensation (FI1) and 5 themes in employee rewards and bonuses (FI4) as shown in Table 4.

Overall, Malaysia companies disclose more non-financial based OHS information (822 themes) than the UK companies (694 themes). Malaysia companies outweighed the disclosure in respect of OHS training and induction (NF113), audit, investigation and monitoring (NF117), OHS awards (NF110) and OHS program for employee and society (NF121). Meanwhile, the UK companies had higher reporting than Malaysia companies in the area of OHS policies (NF118), accidents (NF19) and medical assistances (NF116).

Independent sample t-test was also carried out the find is there any statistical difference of the reporting between two countries. The result as depicted in Table 5, there is no significant difference between Malaysia and the UK for overall OHS reporting (p -value 0.3095). This signifies that Malaysia companies are comparable to the UK companies in the overall reporting. However, there are seven area of OHS reporting indicate statistically significant difference between the two country. The UK companies reported more information on accident (NF19, p -value 0.01) and medical assistances (NF116, p -value 0.01) compared to Malaysia companies. By contrast, Malaysia companies' statistically outweighed the UK companies in the area of OHS training

and induction (NF113, p -value 0.05), employee safety (NF115, p -value 0.05), OHS committee (NF119, p -value 0.01), OHS awards (NF120 p -value 0.01) and OHS program for employee and safety (NF121, p -value 0.01). There is no significant different of reporting exist in information about OHS system and cost (NF17, p -value, 0.50), OHS policies (NF118, p -value 0.22).

DISCUSSION OF THE FINDINGS

The findings can be discussed into six key areas. First, this study employed a wider ranger of pre-determined item to capture the OHS information. As a result, a total of 1,557 themes related to OHS information were found in the 80 annual reports. The findings provide more complete understanding of OHS reporting compared to the prior studies that fall under CSR, IC or risk reporting.

Secondly, in term of frequency, Malaysia OHS information reporting practice is comparable to the UK. This is indicative that Malaysia is at par to developed country in term OHS transparency to stakeholders albeit the absence of solid reporting rules and guidelines compared to the UK country. The findings are contrast to the initial premises that developing country take a lead in the reporting. Perhaps other factors may explain the findings. For example, labour union may has stronger influence than any rules and regulations. It is argued that employee or labour forces in Malaysia as resilient as the UK that likely forces the companies to convey more OHS information. Employee forces that come in form union may

TABLE 4. The rank order of OHS reporting for total reporting

Rank	Code	OHS categories	Total	Mal	UK
1	NF118	OHS policies	576	253	323
2	NF121	OHS program for employee and society	292	215	77
3	NF19	Accident (Death, injuries and diseases)	223	68	155
4	NF113	OHS training and induction	104	76	28
5	NF116	Medical assistances	83	27	56
6	NF120	OHS awards	79	74	5
7	NF117	Audit, investigation and monitoring	76	47	29
8	NF119	OHS committee	38	24	14
9	NF115	Employee facilities	29	24	5
10	FI5	Directors rewards and bonuses on OHS practices	15	0	15
11	NF114	Healty and safely workplaces	12	10	2
12	FI4	Employee rewards and bonuses on OHS practices	11	5	6
13	FI1	Employee accidental compensation	8	2	6
14	FI2	Fines and penalty	4	0	4
15	FI7	OHS system cost	3	0	3
16	NF110	Employee permanent disabled	2	2	0
17	NF111	Employee temporary disabled	1	1	0
18	NF112	Sexual harrasment	1	1	0
19	FI3	Cost of OHS training and awareness program	0	0	0
20	FI6	OHS budgets	0	0	0
21	FI8	OHS audit, investigation and monitoring cost	0	0	0
Total			1,557	829	728

TABLE 5. T-test OHS reporting between Malaysia and the UK companies

	Code	Country	No	Mean	Std Dev	t-value	Significant (2-tailed)
1	FI1	Malaysia	40	.00	.000a	-	-
		UK	40	.00	.000a	-	-
2	FI2	Malaysia	40	.00	.000a	-	-
		UK	40	.00	.000a	-	-
3	FI3	Malaysia	40	.00	.000a	-	-
		UK	40	.00	.000a	-	-
4	FI4	Malaysia	40	.00	.000a	-	-
		UK	40	.00	.000a	-	-
5	FI5	Malaysia	40	.00	.000a	-	-
		UK	40	.00	.000a	-	-
6	FI6	Malaysia	40	.00	.000a	-	-
		UK	40	.00	.000a	-	-
7	FI7	Malaysia	40	.00	.000a	-	-
		UK	40	.00	.000a	-	-
8	FI8	Malaysia	40	.00	.000a	-	-
		UK	40	.00	.000a	-	-
9	NF9	Malaysia	40	1.53	2.271	-2.55	0.05
		UK	40	3.41	4.076		
10	NF10	Malaysia	40	.00	.000a	-	-
		UK	40	.00	.000a	-	-
11	NF11	Malaysia	40	.00	.000a	-	-
		UK	40	.00	.000a	-	-
12	NF12	Malaysia	40	.00	.000a	-	-
		UK	40	.00	.000a	-	-
13	NF13	Malaysia	40	1.89	2.332	3.26	0.05
		UK	40	.61	.858		
14	NF14	Malaysia	40	.00	.000a	-	-
		UK	40	.00	.000a	-	-
15	NF15	Malaysia	40	.48	.862	3.49	0.05
		UK	40	.00	.000		
16	NF16	Malaysia	40	.56	.864	-3.73	0.01
		UK	40	1.35	1.020		
17	NF17	Malaysia	40	.78	.954	.68	0.50
		UK	40	.64	.855		
18	NF18	Malaysia	40	6.11	5.143	-1.23	0.22
		UK	40	7.81	7.060		
19	NF19	Malaysia	40	.55	.741	4.70	0.01
		UK	40	.00	.000		
20	NF20	Malaysia	40	1.77	2.446	4.57	0.01
		UK	40	.00	.000		
21	NF21	Malaysia	40	4.85	4.823	3.76	0.01
		UK	40	1.73	2.108		
	Overall	Malaysia	40	18.51	14.15	1.025	0.309
		UK	40	15.54	11.63		

possess significant power that influence HRM policy and practices which also include the the practice of OHS reporting (Cristiani & Peiró, 2015). This argument is consistent with prior evidences in Malaysia by Rahman, Ahmed, and Hassan (2017) which demonstrated that unionized industry such as banking and finance disclose overwhelming information about employee related information.

Thirdly, in term of quality of reporting, the UK companies however demonstrated more financial based OHS information (34 themes) compared to Malaysia (7 themes). Information about accident compensation, employee rewards and bonuses, director rewards and bonuses and OHS system cost are the only information reported on financial basis. Overall however, the majority of disclosure was in form of non-financial. The findings pose the question was to why all companies from the both countries have been seemingly reluctant to disclose OHS information in a more objective and financial manner. The companies appeared to be recycling the way in which the reported and tended to prefer a 'soft and sketchy' editorial style. Perhaps, the OHS disclosure was seen predominately as a tool to create image, self-promoting and to signal the recognition of employee welfare than as a tool for conveying precise and measureable information. This is an area when the all companies are lacking at and need further improvement.

Fourthly, there is variability of OHS disclosure themes found in this study. Overall data shows that the most popular OHS themes were non-financial based such as OHS policies, OHS program for employee and society, accident, OHS training and induction, medical assistance, OHS awards and OHS audit and investigation. These themes are considered relatively more important and high value to the companies and stakeholders and thus may have contributed to their greater disclosure in annual reports. Meanwhile the least OHS reporting are mostly from financial-based such as fines and penalty, cost of OHS training, OHS budget and cost of audit, investigation and monitoring and sexual harrasement. These information although seems to be important but they are least disclosed. This might be due to the sensitive case of the information to companies or activities that related to the information did not take place in the companies.

Fifthly, a few difference in the OHS reporting between countries also emerged. The UK companies reported more OHS themes than Malaysia companies in the area of occupational accident (death, injuries and diseases), medical assistances and OHS policies. Meanwhile Malaysia companies outweighed the UK companies in term of OHS training and education, OHS audit, investigations and monitoring, OHS awards and OHS program for employee and society. Overall, the significant low level of the reporting occurred in Malaysia companies as compared to their counterparts in the UK is information about occupational accident cases. Malaysia companies only reported 68 themes which substantially less often than the UK companies that mentioned 155 themes in the annual reports. This type of information is considered 'strategic

case' for potential stakeholders and thus must be an improvable area of OHS reporting by Malaysia companies. Although the absence of occupational accident cases may not lead to disclosure requirement but the fact about that has to be disclosed. In comparison with Koskela (2014), the study found that a total OHS disclosure by three companies was of 291 units (or almost 100 units per company) which substantially higher than Malaysia companies average (21 themes) and the UK (18 themes). However, the Koskela (2014) findings must be compared precautiously as the study focused on specific OHS sensitive companies. The different method of capturing content may also render the different results.

Sixthly, this study's findings are consistent with the stakeholder's theory. The theory is not only predictive for CSR, IC and risk reporting as a whole but it also predictives for the sub-theme of those reporting, in this case, OHS reporting. By the way, the companies from Malaysia are at par with the UK companies in discharging their accountability to stakeholders, particularly to their employee. The Malaysia companies practise a broad OHS measures and works and also enhanced their accountability by disclosing wide range of OHS information as much as reporting leading country.

LIMITATION AND FUTURE RESEARCH

This study has s few limitations. First, a small sample size from two regions covered in this study is not considered wider enough to produce valid inferences. A richer analysis can be provided by the inclusion of a largr sample size and wider number of countries in future studies. This would have enabled more country effects in OHS information reporting to be observed.

Second, this study did not conduct any systematic test to ensure content analysis reliability. Nonetheless, in order to minimise such problems and hence increase reliability, clear and detailed rules of recording were drawn up, and rigorous training and supervision was undertaken. These measures are considered a robust response to enhance the reliability of data when inter-coder agreement cannot be conducted (Guthrie, Petty, Yongvanich et al. 2004; Milne & Adler 1999). Third, the exclusion of non-text reporting such as pictures suggested by Beattie and Thomson (2007), Hooks, Steenkamp and Stewart (2010) may have limit this study somewhat in that OHS information reporting in conceivably conveyable in this forms. According to Davison (2010), visual image are not only looks exciting but it may also act as complementary information in annual reports and be able to strongly represent management's belief of something (Davison 2010). Therefore, this is also an area where future studies could discover the new way that OHS information is exposed.

In addition, future studies should carry out in-depth interview with representative of companies to obtain understanding about the actual motives behind the development of OHS reporting. Engagement with companies to gather evidence about managers' perception

on the importance and value of OHS reporting would be very interesting, especially interviewing those capable of commenting on the changes of perception in business health and safety over time and how those changes have affected the corporate reporting strategies. At the same time, the question of why companies report at different quality could also be investigated. Future research may examine user perspectives by obtaining opinion on what and how OHS information is consumed and therefore should be reported. It is important to ensure users' opinion and actual needs when constructing OHS reporting so that quantity as well as quality gap can be closed. This in turn would enhance the decision usefulness of OHS information for the users.

CONCLUSION

This study sought to compare Malaysia OHS reporting against the UK using the stand-alone OHS reporting index. The findings of this study contribute to the six key understandings. The index employed in this study is capable to capture the OHS items exhaustively, hence give more complete evidences of OHS reporting practice compared to the evidences demonstrated in prior CSR, IC and risk reporting studies. Malaysia is comparable to so-called leading reporting company in the respect of OHS reporting. However, Malaysia companies are lacking financial-based reporting which requires further improvement. There is difference popularity of OHS items to be reported and a few differences also exist between countries. Lastly, accountability to employee also emerges in the area of OHS as evidenced by disclosure practices.

ACKNOWLEDGEMENT

We would like to acknowledge the research grant that we have received (EP-2015-023) in completing this study.

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APPENDIX A

No.	Malaysia's companies	United kingdom's companies
1	Malayan Banking Berhad - Maybank	RELX Group
2	Public Bank Berhad	NEXT
3	Tenaga Nasional Berhad	Centricia
4	Axiata Group Berhad	ARM
5	Sime Darby Berhad	Rolls-Royce Group
6	Maxis Berhad	BAE System
7	Digi.Com Berhad	SSE PLC
8	Cimb Group Holdings Berhad	Legal and General Group Plc
9	Petronas Gas Bhd	Tesco
10	Petronas Chemicals Group Berhad	CRH Group
11	Ihh Healthcare Berhad	Compass Group
12	Ioi Corporation Berhad	WPP Group
13	Genting Berhad	Glencore
14	Misc Berhad	SKY
15	Hong Leong Bank Berhad	Standard Chartered PLC
16	Telekom Malaysia Berhad	AVIVA PLC
17	Kuala Lumpur Kepong Bhd	Royal Bank Of Scotland
18	Rhb Capital Berhad	BHP Biliton
19	British American Tobacco (Malaysia) Berhad	Associated British Food
20	Ytl Corporation Berhad	SHIRE
21	Petronas Dagangan Berhad	Imperial Tobacco
22	Hong Leong Financial Group Bhd	National Grid
23	Ppb Group Berhad	RIO Tinto
24	Nestle (Malaysia) Berhad	Unilever
25	Sapurakencana Petroleum Berhad	BG Group
26	Astro Malaysia Holdings Berhad	Banco Santander Central Hispano
27	Umw Holdings Berhad	BP
28	KLCC Real Estate Investment Trust	Prudential
29	Westports Holdings Berhad	Reckitt Benckiser Group
30	Gamuda Bhd	Barclays
31	Ytl Power International Berhad	Diageo
32	Hap Seng Consolidated Bhd	Sabmiller PLC
33	Malaysia Airports Holdings Berhad	Astrazeneca
34	Dialog Group Berhad	LLyods Banking Group
35	Sp Setia Bhd	Vedafone Group
36	Batu Kawan Bhd	Glaxo Smith Kline
37	Lafarge Malaysia Berhad	British American Tobacco
38	IOI Properties Group Berhad	HSBC Holdings
39	Felda Global Ventures Holdings Berhad	Royal Dutch Shell
40	Genting Plantations Berhad	BT Group PLC