



ARBEJDSMILJØSEKTIONEN  
AALBORG UNIVERSITET

# WHEN THE DANISH WORKING ENVIRONMENT AUTHORITY VISITS

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INFORMATION ABOUT THE AUTHORITY'S INSPECTIONS AND  
GOOD ADVICE ON VISIT PREPARATION



The Working Environment Section  
AALBORG UNIVERSITY

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## Introduction

It is in AAU's interest that all departments maintain a constructive dialogue with the Danish Working Environment Authority (WEA, in Danish: AT).

To have a good dialogue and get the best outcome from the inspection visits, it is important that you know the role and working methods of the WEA and that you are as prepared as possible when they come.

In these GOOD ADVICE, you can read about how you should prepare when the WEA comes for an inspection visit, and what to expect when they have been.

Through the dialogue with the WEA, you will receive important input that helps ensure your ongoing working environment efforts have the right focus and lead to satisfactory results for the benefit of all employees. Therefore, the inspection visits from the WEA are welcome for AAU.

## The authority role of the WEA

The WEA has several standing powers and rights.

The Authority's inspectors have access to AAU's departments **at any time without a court order**, but with proper identification.

The Authority can request any available documentation for review, take photographic documentation, or request samples for analysis.

All AAU employees must provide the Authority with **all information** necessary for the exercise of its functions upon request. This includes information that is normally considered sensitive or confidential.

The Authority has access to data from various registers containing personal or company-sensitive information, including the income register, CPR register, etc.

As a result, you should **not** withhold information that the Authority requests access to or otherwise hinder the Authority's inspection activities, for example, by referring to confidentiality, data protection legislation, or other legislation.

**If in doubt, you should consult the Working Environment Section** (in Danish: Arbejdsmiljøsektionen).

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## Visit notifications

As a rule, the WEA's visits are **unannounced**, so you do not know the exact visit time in advance. Previously, the Authority **notified** visits in writing at least 1 month in advance – still without specifying the exact visit time, but this practice ceased as of July 1, 2023.

In certain situations, the Authority chooses to **announce** inspection visits – in some cases even after prior agreement with you. For example, this occurs if the Authority wishes to check work that is not performed daily but at **specific times**, or if the Authority wishes to speak with **specific individuals**.

The relationship between announced and unannounced visits is shown below.

AAU's knowledge of the WEA's visits	
<b>Announced visit</b>	AAU knows the visit time, which is set by the WEA or agreed upon mutually. Normally, the visit time is confirmed in writing by the Authority. The visit time can usually be changed.
<b>Unannounced visit</b>	AAU does not know the visit time. AAU is not aware that the WEA is coming. The visit is solely based on the Authority's own planning. The visit time cannot be changed.

An unannounced visit will, in practice, be experienced as **unexpected**, as it is no longer notified in advance. This is a central premise of the WEA's control function, and therefore you should **not** expect the Authority to change its visit time, even if the visit takes place at a time or in a situation that is **inconvenient** for you for one reason or another.

If you have compelling reasons to request a **postponement** of the visit, you can present this to the inspectors when they arrive, but you should be aware that if the Authority's employees find it necessary, they will carry out the inspection visit **on their own**.

The WEA and AAU have an interest in **mutual dialogue** during an inspection visit, and therefore everyone who may be involved in an inspection visit should be prepared to interrupt other activities to participate in the visit.

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## Inspection visits at the departmental level

In planning visits, the WEA uses the informations in [the CVR register](#) (The Central Business Register) about AAU's addresses. It is AAU's Finance Department (ØA) that ensures the information in the CVR register is updated. AAU's CVR number is 29102384.

Departments are referred to as **production units** in the CVR register, each assigned a **P-number**. These production units are selected by the Authority for visits.

Unfortunately, a given company can only have **one P-number per address**, which means there is not always alignment between AAU's administrative division into departments and the CVR register's listing of production units under AAU.

Note especially that a visit to a production unit under AAU may involve multiple departments. This applies, for example, to visits to P-number 1017491810, which corresponds to AAU's lease in the ACM15 building in Copenhagen.

Similarly, a visit to a production unit may mean that only parts of a department are visited. This applies, for example, to visits to P-number 1014988196 corresponding to the PON107 building in Aalborg East, which is one of several buildings used by the Department of Energy.

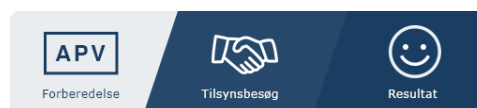
Therefore, at the start of any visit from the WEA, there is a need to clarify which departments the Authority actually wants to visit so that the right people can be involved.

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## Preparation for a WEA's visit

**You can prepare for a WEA visit**, even if the visit time and content are not known.

Most inspection visits will begin with a **meeting** where management and members of your local work environment organization are expected to participate. This is followed by a general **tour** or **inspection**. Finally, a **concluding meeting** is held where the inspectors will usually inform you about expected reactions from the Authority or if there is a need for further inspection visits.



It is advisable to always be ready for an inspection visit by preparing the following:

- **Agree on who should participate in an inspection visit (at each production unit).**  
Consider, for example, whether everyone in your working environment organization should attend the meeting with the WEA, while only a few selected individuals join the tour.
- **Agree on who will take notes during the visit.**  
Remember to note the names of the inspectors, as this will facilitate subsequent telephone contact.
- **Prepare the tour.**  
As a rule, the Authority will want to look into all rooms and see all activities. Therefore, make a suitable plan for the tour for each production unit and be prepared to explain what is being worked on in the various rooms or locations. Also, ensure that necessary safety equipment and personal protective equipment are ready for all participants. The Authority's inspectors (typically 1-2 people) usually bring their own helmets and safety footwear, but not, for example, respiratory protection, protective clothing, hairnets, or shoes covers.
- **Prepare to describe your working environment organization (AMO).**  
This is especially important when the visit takes place in production units consisting of several small sub-departments of AAU. The Authority needs to note who they are talking to and what role they have (management representative or health and safety representative).
- **Prepare to present the status of your workplace assessment (APV) work and other working environment efforts.**  
The Authority emphasizes that you account for your APV, including whether the problems identified during the inspection are part of the ongoing APV work. Also, be prepared to talk about other activities, such as safety rounds, training and instruction procedures, or activities aimed at strengthening the organizational and social working environment.
- **Check that all mandatory documentation is in order.**  
This primarily concerns chemical APV for hazardous substances and materials, user manuals, training certificates where required, and documentation for mandatory inspections. It may also include, for example, minutes from committee meetings or overviews of accidents.
- **Consider informing your employees.**  
Consider how your working environment organization and affected employees are best informed about the inspection visit and its outcome. For example, consider holding an extraordinary committee meeting or a more general employee meeting, especially if the Authority decides to issue an injunction during the visit.

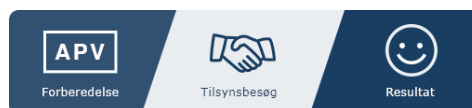
The Working Environment Section (AMS) can be involved in your visit preparations if necessary.

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## The WEA's inspection methods

The Danish Working Environment Authority has quality procedures for inspection visits. The two most important types of inspections are:

- **Basic inspections**
- **Special inspections**



**Basic inspections** are **general inspections** conducted at companies with employees where the Authority expects the highest risk of work environment problems. All departments at AAU may be selected for a basic inspection. Basic inspections are generally unannounced.

**Special inspections** are conducted when there is a specific reason at AAU. During special inspections, the Authority focuses on a **specific working environment problem**, not the working environment in general. Special inspections may be conducted in connection with a serious accident or to check if a previously issued injunction has been complied with.

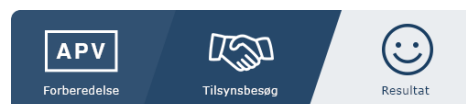
Special inspections are also generally unannounced.

Regardless of the method the Authority uses during the visit, you should expect that when the Authority's inspectors come, they have a reason – they have a **purpose**.

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## The WEA's reactions after the visit

The Danish Working Environment Authority's reactions after the visit mainly come in the form of written **injunctions** or **guidelines**. Unlike guidelines, injunctions have legal effect and must therefore be complied with.



The Authority issues injunctions if the inspection assesses that the working environment is not safe, resulting in a violation of working environment legislation. The inspectors assess **the evidence** in this context and, as a rule, the Authority only issues injunctions when there can be no justified doubt about the nature of the working environment conditions. This is the case, for example, if the inspectors have **personally observed the violation**. However, injunctions can also be issued **based on information** received during the visit.

Injunctions contain **requirements** for improving the working environment, which must be implemented within a **deadline** set by the Authority. In some cases, the Authority allows you to have input on the deadline. If it turns out that the deadline is difficult to meet due to unforeseen difficulties in the work on the solution, you can request an **extension** of the deadline in writing. It is important to do this well in advance of the original deadline's expiration.

If the WEA is uncertain about the state of the working environment, they can order you to investigate the working environment further – typically with the help of external consultants – this is commonly referred to as an **investigation injunction**. If you receive an investigation injunction, it is important to contact the Working Environment Section to ensure that this type of injunction is handled correctly and that any contributions from external consultants are quality assured.

In the case of a **serious violation** of working environment legislation, an injunction deadline can be short, possibly **immediate**. With **immediate injunctions**, there is no possibility of an extension, and the Authority will also consider **legal action**.

If the Authority assesses that there is an **imminent, significant danger**, they will issue a **prohibition** against continuing work until the danger is effectively countered. In such cases, you should expect that the Authority will always recommend to the prosecution that legal action be taken against AAU.

All injunctions are **written** and typically sent for consultation within 14 days after the inspection visit, unless the consultation has already been conducted during the visit. If you have no comments on **the basis for the injunction** within the consultation period, the injunction will take effect and must be complied with. Note that you can only comment on the basis for the decision, not the decision itself during the consultation phase.

Always respond to consultation letters – even if it is not required. Experience shows that misunderstandings or errors can easily occur in the Authority's description of the facts, but it is essential that the Authority makes decisions based on correctly described facts.

Prohibitions and immediate injunctions are issued on the spot and later confirmed in writing. Since prohibitions and immediate injunctions take effect immediately, there is no consultation opportunity.

At the same time as the injunction to improve the working environment, you will be required to **report back** on how the injunction has been complied with. The deadline for this is typically 7 days after the **compliance deadline**.

In addition to issuing injunctions or providing written guidance, the Authority can issue administrative fines. This can happen when the inspectors have observed a violation of clear and well-known rules, such as a person operating a forklift without a certificate or working in a crane zone without a helmet. If you oppose receiving an administrative fine, you should expect the matter to be decided in court.

Instead of issuing an injunction, the Authority may choose to offer you an **agreement process**. This will typically happen at AAU in situations where the Authority suspects a working environment problem that is not fully uncovered but believes you can solve it yourself – with guidance from the Authority. In the agreement, you commit to solving the problem within a certain timeframe.

Agreement processes are not legally binding in the same way as injunctions, and AAU will not be penalized for not adhering to the agreement. However, if AAU does not adhere to the agreement, you risk the Authority issuing an injunction to solve the problem.

Generally, it is advisable to comply with the agreement. This way, you retain control over how and with what means a problem should be solved, and you demonstrate to the Authority that you, on behalf of AAU, can improve the working environment through targeted efforts. Experience shows that you will also retain some influence over the timeframe for solving the problem, especially if you create a realistic action plan for the work.

All formal written communication with the Authority (e.g., feedback on decisions and agreement processes) must be done digitally via a self-service solution on Virk.dk. If you do not have employees with access to Virk.dk, the Working Environment Section can assist with the digital communication.

During the visit, the Authority's inspectors will ask about the working environment and make verbal comments or suggestions that you should consider. It is important to note these comments, as they provide guidance the Authority's assessment of the working environment, even if the Authority chooses not to issue an injunction.

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## Complaint options

If you disagree with the WEA's decisions, you can appeal to the Authority. This must be done no later than 4 weeks after an injunction is received.

If the Authority upholds the injunction in whole or in part, the appeal is forwarded to **The Working Environment Appeals Board**, which decides the case. The Working Environment Appeals Board is part of The National Board of Appeals. An appeal will normally have a **suspensive effect** on an injunction, but this does not apply to immediate injunctions and prohibitions, which you must comply with regardless of any appeal.

The Working Environment Section (AMS) must be involved **before** you appeal the Authority's decision. Remember that an injunction case affects not just a single department, but in principle the entire AAU.

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## More to read

Read more about inspection visits and inspection procedures on the Danish Working Environment Authority's website [www.at.dk](http://www.at.dk), under the topic "Inspection." This website is partly in English. Inquiries about this document can be directed to The Working Environment Section at [arbejdsmiljoesektion@adm.aau.dk](mailto:arbejdsmiljoesektion@adm.aau.dk).

AAU – The Working Environment Section, September 2024

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