



**EFN POSITION PAPER
ON DIRECTIVE 2003/88/EC OF THE EUROPEAN
PARLIAMENT AND OF THE COUNCIL OF 4 NOVEMBER 2003
CONCERNING ASPECTS OF THE ORGANISATION OF
WORKING TIME**

The European Federation of Nurses Associations (EFN) represents over one million nurses and is the independent voice of the profession. We welcome the opportunity to set out the profession's views on certain aspects of the Working Time Directive.

EFN believe that working time should be balanced with personal time and the time spent at work should allow responsible and safe working practices.

To achieve this, EFN will work to ensure:

- Better protection of employee health and increased patient safety through reduction of the maximum weekly working time;
- Use of the opt-out clause is limited as much as possible and finally phased out, as every employee should have the right to limit their working time;
- There is no extension of the reference period, from which the weekly working time is estimated;
- Retention of the Directive's original definitions of working time. Public employers in the EU have called for "presence time" to replace time spent in the duty room when on-call. This is unacceptable, as the requirement to be present physically at the workplace should be considered part of proper working time;
- Clarification of the Directive's term "adequate protection", if the specified rest and off duty periods are not observed.

EFN will also propose measures that make it easier to combine working and personal life.

EFN Position Statement - 29 October 2004 (Reviewed - June 2007)

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