



# 3 C's of Safety Compliance

## THERE ARE THREE DISTINCT TYPES OF SAFETY COMPLIANCE

When many employers comply with a safety requirement or recommendation from OSHA, or their insurance carrier, or some other authority having jurisdiction, they often feel confident that they have met their obligation and are now *"in compliance."* But did you know, that many of the governmental departments and other organizations that create safety requirements and/or submit recommendations often have very different viewpoints and/or agendas? And that being the case, being *"in compliance"* with one authority, oftentimes does not assure being in compliance with all.

At *Safety by REQUEST*, we coined a phrase to reflect this reality which we refer to as the *3 C's of Safety Compliance*. In brief, the safety requirements and recommendations that employers need to comply with generally fall into one of three categories:

**COMPLIANCE SAFETY** refers to those safety requirements or recommendations that an employer must comply with in order to avoid associated citations or penalties. They generally come from departments that are federal (like OSHA), state (like PESH) or local (i.e. municipal). Frequently these requirements and/or recommendations reflect minimum safety precautions, and at other times they do not reflect safety at all. For example, many employers are required to complete and maintain *OSHA Injury and Illness Recordkeeping forms*, and failure to do so may result in citations and penalties. But in reality, the act of maintaining these forms does not keep a single employee safe. *So the main incentive for an employer to comply with Compliance Safety concerns is not the reduction of injuries and illnesses, but the avoidance of citations and penalties.*

**CARRIER SAFETY** refers to those safety requirements and recommendations that come from an employer's insurance carrier, and failure to comply with them may result in higher premiums or loss of coverage. But what many employers fail to realize, is that such carrier "safety" concerns are not primarily focused on safety. This is why they are referred to as loss control recommendations, because their focus is to control the payout of losses so as to increase the carrier's profit. For example, when a carrier requires an employer to implement a *Return to Work Policy*, it is primarily done so to provide the carrier a financial advantage. And in addition, many carriers specifically avoid referencing *Compliance Safety* or *Common Sense Safety* concerns, so as to avoid the potential liabilities involved. *Therefore, the main incentive for an employers to comply with Carrier Safety requirements is lower insurance costs, not safety.*

**COMMON SENSE SAFETY** refers to *those safety efforts that are taken to help reduce the occurrence and severity of accidents and injuries in the workplace*. And while it is true that significant financial savings are often enjoyed by employers who implement various *Common Sense Safety* controls, that is not their primary focus. In some cases, *Compliance* and *Carrier Safety* requirements may reflect *Common Sense Safety* practices, but frequently this is not the case. For example, one of the leading causes of workplace injuries and illness is improper ergonomics. *Common Sense Safety* will implement appropriate controls and training, whereas OSHA does not even have an ergonomic standard and few carriers adequately address the exposure.

At *Safety by REQUEST*, we understand that each of the *C's* is important in its own way. That's why our programs and training are designed with *Compliance Safety*, *Carrier Safety* and (most importantly) *Common Sense Safety* in mind. For assistance with the *3 C's of Safety Compliance* please contact [www.SafetyByRequest.com](http://www.SafetyByRequest.com)

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