



POSITION
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Definition of occupational safety and health (OSH) injury indicators in the form of international standards

At a meeting of the [EUROGIP](#) Executive Board of 12 November 2019 strong concern has been expressed about the draft technical specification of ISO TC260 “Human Resource Management” aimed at standardizing, at the international level, occupational health and safety injury indicators.

This project, carried out in support of an international standard ISO 30414 published in 2018 “Guidelines for internal and external human capital reporting”, aims to define indicators that will enable human resources managers in companies to prove their value creation, in particular by measuring the number of accidents at work (with or without work absence) and deaths at work.

Whether any initiatives aimed at the rigorous monitoring of occupational risks and accident occurrence should be encouraged in order to better prevent them, the EUROGIP Executive Board warns about an international standardization of accident statistics.

Global work injury indicators would in no way allow companies to be compared with each other on a worldwide scale to judge the quality of the occupational risk prevention they implement. On the contrary, they could be counterproductive for the reasons set out below.

1• Concept of accident at work

In most countries, the concept of accident at work is fundamentally linked to its (their) Occupational Injury insurance system(s); within the same country, different systems may coexist (public, private, sectoral accident insurance, etc.).

Among the many examples of heterogeneity of concepts, some systems exclude from the definition of accidents at work those that do not result in work absence (or even in a minimum number of days off work). Others, on the contrary, include all work injuries, even those that do not result in temporary incapacity.

In addition, some systems reject the classification as an accident at work when the injury is the result of "faulty" behaviour or a voluntary act by the victim, while others consider that the company's liability extends to such cases.

The triggering moment for the obligation to report work injuries is therefore very different from one country or system to another. This is a major obstacle to comparability.

Similarly, in the case of unexplained death at the time and place of work (such as a heart attack with no apparent link to an occupational cause), many systems disregard a priori the classification as an accident at work until proof of a link to work is provided. Others classify them a priori as an accident at work unless the extraprofessional nature of the accident can be proven (pre-existing pathology in particular).

These differences in the burden of proof already have a very strong impact on comparative statistics between a few countries, which suggests the biases they would create in global comparisons.

It is therefore highly foreseeable that global comparative injury indicators cannot be set by reference to the most demanding levels in terms of the obligation to report and/or recognise professional claims.

They would result in penalizing companies under a system that widely recognises and repairs accidents at work and occupational diseases when their results are compared to those of companies in countries which have more restrictive policies in terms of recognition and reparation of occupational injuries or which hardly have such policies.

2• Statistical biases

In addition to the above structural biases, comparisons of the number of work accidents would only make statistical sense for companies with a significant number of employees.

Indeed, the occurrence of an accident at work in a small or medium-sized enterprise (SME) remains a statistically rare event. Comparing SME frequency indexes on a global scale would make no sense at all since it would require reliable statistical series for the same enterprise over decades.

Finally, confusion will increase over the scope of the comparisons, as these are indicators supporting a standard on "internal and external human capital reporting".

The concept of "external" companies would require the establishment of strict and verifiable common rules since it would be a question of aggregating the results of the company concerned with those of "intervening" companies, temporary workers, subcontractors and defining up to what rank. The answers to these questions could influence policies for outsourcing the most dangerous work.

At the European level alone, numerous studies show the extreme difficulty of publishing comparative statistics between countries.

To do so on a global scale, and even more so by individual companies, in order to make comparisons that are supposed to verify the creation of value in the field of OHS, seems risky, to say the least.

These types of ISO indicators, which would be used by purchasers to compare suppliers, cannot allow fair comparisons. Contrary to the desired objective, these indicators would inevitably penalize sites located in countries with the most advanced systems in terms of insurance and prevention of occupational risks.

They could, in a worst case scenario, provide an incentive, backed by an international standard, for under-reporting of work accidents by competing with social security systems on their levels of requirements.

it would therefore be advisable for the bearers of this draft technical specification to measure the many biases and risks that this seemingly laudable proposal will generate.

Other areas of work should be given priority in order to serve the stated objective of a comparative measurement of commitment to OHS, such as carrying out risk assessments, developing prevention programmes, OHS training, providing personal protective equipment, etc.