

Beyond Compliance: Breaking Through to the Next Level of HS&E Excellence

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Congratulations! You've worked long and hard. Armed with the commitment and support of both line and management employees, you've achieved compliance with OSHA/EPA and company requirements. You've spent countless hours conducting work site analyses, auditing, cheerleading and assuring that hazard prevention measures and controls are in place. At last you've achieved compliance with regulations and requirements! It's time to celebrate, pat each other on the back and take a breather. Or is it?

Of course you and your team deserve a chance to bask in the glow of your accomplishment, feeling proud of what you've achieved together. But in fact, now is when the really hard work begins. The larger, ongoing challenge is continuing to excel once an objective measure of excellence has been attained.

It's Human Nature

It is common that, after reaching a sought-after goal, we often redirect our attention and energy elsewhere, typically towards another objective. Or thinking things are now handled, we kick back, abandoning the very efforts that helped us reach that goal. Either can signal the beginning of a deterioration in performance.

Our company was asked to implement our attitudinal and behavioral improvement process at a large research and development site of a major chemical company that had achieved compliance with the standards and requirements similar to those sited above. Site leadership was perplexed. Why, they wondered, following a period of remarkably low injury and illness rates, did their performance appear to slide, with accidents, injuries, and health incidents on the rise?

We determined that performance began to drop off shortly after compliance had been achieved. The perception was that, now that the facility was in compliance, safety and health were somehow being "handled" and that the rigorous attention that had been put into place during the compliance process was no longer necessary.

How, then, do you move successfully beyond achieving any goal or objective i.e. OSHA Star Certification or other regulatory and company compliance to a level of awareness and proactivity that keeps all levels of employees interested and motivated to maintain health, safety and environmental (HSE) excellence for the long haul? We believe the key is in assuring that a high level of HSE performance is not only embodied as a company value, but is held as a personal value by every employee.

This article explores the primary factors that can cause an erosion of performance, and suggests what is needed to sustain performance and break through to the next level of excellence.

We have found from our experience working with a variety of companies over the past 27 years that key to ensuring a high level of self-motivated and self-generating employees is ensuring that their attitudes and values reflect a personal belief in the benefit of safe, healthy and environmentally sound practices for themselves, their co-workers, families, communities and planet.

Since not every employee is involved in any compliance or certification process, we can't assume that everyone shares the same values or believes in the benefit of complying with what is required. In our training sessions we always ask, "Who is the only person around you 100% of the time?" The obvious answer is: "You are!" So how do we ensure that all employees are self-motivated and self-generated for safe practice? How do we ensure that they are willing to take personal responsibility for themselves and others on and off the job? How do we ensure that they are willing to intervene immediately when another employee, contractor or visitor is observed not complying with requirements? Since most companies ideal is that all levels of employees embrace the values and attitudes that keep themselves and others safe, how do we ensure that this in fact does occur, as not all employees are directly involved in any compliance or certification process, nor are they interacted with on an individual basis until their belief in these values is confirmed?

A Holistic, Integrated Process

To reach and sustain higher levels of performance it is essential to implement a holistic, integrated culture change and attitudinal and behavioral improvement process. This includes building a common HSE culture (including norms, values, attitudes and behaviors), which permit everyone at your site to continually work towards a common vision of excellence with objectives and goals that support their vision.

Once compliance to any objective, goal or regulatory process has been achieved and acknowledgements have been given, it is necessary for the same teams that led the charge for compliance or certification to begin exploring the necessary steps to create the next breakthrough in HSE performance.

We can't assume that most sites have been asked and answered the question as to "what barriers exist to preventing injuries and incidents of all types" as most of the attention has been towards the compliance or certification process. Many, if not most have achieved acceptable records as well. The question to move forward should be "what barriers either continue to exist that we have not fully addressed and resolved yet, and/or how to we maintain yet analyze and continually improve existing systems, regardless of our level of excellence?"

Human Factors

A key aspect to focus on here relates to human factors and injury and incident prevention. Addressing the work environment and related safeguards must of course be thorough and complete. What we cannot assume is that the attitudes and behaviors of all levels of employees are addressed on a daily basis! Even though goals and objectives have been achieved, often a limited number of people were actually involved in the compliance or certification process. If this is the case, can we assume that all employees are thinking and behaving in a safe, healthy,

and environmentally sound matter? Can we maintain our current level of performance, if what can occur is similar to the example given above relating to the facility whose performance slid back after compliance with requirements had been met? How do we prevent management and labor employees from reverting back to old standards and beliefs, including putting production, research, distribution and other necessary results ahead of HSE, especially during current business challenges such as downsizing, increased competition, and economic and political factors?

It's controversial, yet it's been asserted that some 94-96% of workplace injuries are due to unsafe acts and more than 90% of those are also due to unsafe conditions. (Source: Accident Prevention Manual for Business and Industry starting with the 3rd edition in 1955 through the 8th edition in 1980). Whether this number is accurate or not, Topf Initiatives research has found that most incidents are caused by one of two human factors. The first is automatic or non-deliberate behavior, which is related to our ability to focus and pay attention, as well as, stress and fatigue. In 1983, we found stress to be a factor affecting HSE performance at a chemical company with world-class performance, and we predict it will play an even more dramatic role as we move further into the 21st century. With all the down sizing, upsizing, reorganizing and other organizational changes, unless properly addressed, stress will continue to be a major cause of industrial injuries and illnesses. The tragic events of 9/11 have given us a new set of safety concerns that dwell on the minds and emotions of employees everywhere. Incident reports over the past 20 years of being in this field have shown that well trained and well-equipped personnel, following all prescribed procedures, have been injured, as well as, injure others due to this human factor.

The second factor is conscious or deliberate behaviors, which relates to our attitudes, beliefs and decision-making processes. Concerns and priorities from both home and work affect our thinking and decision making process. In facilities that have achieved goals and objectives related to compliance especially, most people clearly know what to do and not do regarding HSE performance. They have been trained and equipped for proper procedures. This is not the issue. The issue is that they don't always do what is required and what they know is safe practice. Safety at home, vacation, sports, hunting, fishing and the like is not always followed. Time, comfort, convenience, being macho, or unwilling to spend the money it would take to be as safe as possible, affect our decisions and behaviors and incidents can result.

An employee from one facility that we worked with that had achieved excellence levels of regulatory compliance reported in one of our training sessions that he had an injury when working on his home. Using a ladder that was too short, he had to extend himself to reach a point on a gutter he was trying to fix. He lost his balance and fell to the ground below. When asked why he was using a ladder that was too short, he reported with some embarrassment, that he didn't want to spend the money for a taller ladder. This same attitude also applies in many businesses, where decisions not to invest necessary money and time to provide proper safeguards and training, or improve unsafe, unhealthy and/or environmentally unsound conditions are made.

Skills to prevent incidents must be internalized, and they must be able to be generalized to situations other than what a person is trained for, as people move to new circumstances at work and at home. An article in the November 2001, Safety & Health Magazine, called 'Safety Numbers At A Crossroads', by Gay Lynn Cronin, asserts that there are more off the job deaths and injuries (includes disabling injuries) than on the job from unintentional incidents. (Source

National Safety Council estimates). Also, since we can't guarantee that the people around us in every situation won't take actions that can get us hurt, or will be the most constructive influence to behave safely, each one of us must be personally responsible for this challenging task.

The pioneering work of HW Heinrich from the late 1920's, early 1930's, asserted that for every incident, from a fatality to a near miss, many more underlying unsafe behaviors leading to the incident could be identified. Topf research has taken this a few steps further to include the two accident causing behaviors mentioned above. Also, included is the fact that attitudes and behaviors of others can cause incidents to occur.

We have modified the ancient proverb that says, "Give a person a fish and they will eat for a day. Teach them to fish and they'll eat for a lifetime." Our variation states: "Give an employee PPE and a set of safety regs and they're safe for a day. Change awareness, attitudes, beliefs and behaviors, and they are equipped to be safe for a lifetime."

Easy as ABC

The primary goals for lasting change should include permanence of the change and the ability for employees to generalize the change so they can apply their learnings in any situation, at work or at home. Greater awareness is essential to help employees become self-observant and self-managing. Once a belief is formed, we humans operate fairly automatically, and we habitualize the behavior. Think of how many times you have run a "yellow traffic light" automatically because you did it before and got away with it. For greater safety, awareness must start with self-awareness, leading to self-observation and self-management skills, which lead in turn to new choices for safe attitudes and behaviors.

The A-B-C model from behavior science theory, derived from the work of B.F. Skinner, states that activating events (A) lead to behaviors (B), which lead to consequences (C). Apply a positive or negative reinforcement to an observed behavior and the result should be more or less of that behavior. This premise is limited in its' long term effect given the cognitive ability of humans to rationalize and justify anything we do.

The infrequency of observations also limits their effectiveness. When we are observed, say by a passing a police car, we slow down. As soon as we think we are out of the officer's sight and radar, most of us resume a rate of speed we believe we can safely get away with. The same applies relating to safe practices at home and work. When we are out of sight of a safety observer, most of us revert back to the behavior we believe in. Lasting change requires that beliefs that underlie unsafe behaviors be addressed. Rather than hope for this to occur as a result of a series of observations and related interactions, the process of changing unsafe beliefs to safe ones can be accelerated and achieved in a classroom setting using methods derived from cognitive behavioral theory and experienced based learning. Management and line employees can learn to observe and gain insight into their own thinking process, beliefs, and the behaviors that result from them.

The Strength of Beliefs

There are both organizational beliefs and personal beliefs that influence the choices we make and the resulting behaviors. Beliefs are defined as habits based on trust and confidence in some person or thing. They cause us to act in a particular way on a continual basis. In the workplace, the culture of the organization assures that beliefs, stressing positive or negative behaviors, are

passed on to new employees. Although work place procedures and safeguards may be established and known, beliefs such as “I know what I’m doing, so I can shortcut this procedure and nothing will happen to me” can cause even the most safety minded people to put logic aside and by-pass procedures to accomplish an organizational or personal task or goal.

An incident occurred in one facility where we were working, when a chemist, knowing that protocol mandated that a process he was working on be shut down to make a correction, decided to make the correction without shutting down to save precious time in a competitive business climate. Fortunately no one was injured, yet, the incident was discovered by the lab supervisor when she stopped in to check on his progress.

This situation demonstrated that personal values must also be addressed. This chemist thought his action was in the best interest of his company and their financial success. Values are the principles and standards we consider worthwhile and thus exert a strong influence on behaviors. Leadership needed to reinforce that the organizational value for the safety, health, and well being of each person must take precedent over the personal value of this chemist in regards to achieving a competitive edge and that he must follow protocol in the future.

To achieve a breakthrough in HSE performance, it is essential for labor/line and management to identify current values, as well as, identify gaps between perceived values and professed values. The goal is to insure that the daily behaviors of all employees reflect the true commitments of management and line employees. This blueprint will assist people in staying on course in how they and the company will perform.

Since sites committed to compliance to OSHA or EPA requirements or recommendations generally have strong organizational beliefs and values relating to HSE, a practical format for teaching and reinforcing these values for both management and line employees are:

1. Conduct a present time survey to determine employees’ perception and understanding of the organizations’ stated beliefs and values related to HSE. Include both management and line employees. Ask questions to find out if what is proclaimed and what people believe to be true are the same. Determine if past values hold true today. (Remember, times and circumstances cause values to change. What was so may no longer be so. We can’t assume that what was, is now!)
2. Perform a gap analysis of the stated values of the organization and what the perception survey shows.
3. Determine where there are differences in the stated values and perceived values. Bottom line, we want to find out incongruencies between what is said and what shows up in daily practice.
4. Feed this information back to a group or committee consisting of a cross section of management and line personnel, empowered to determine what values and beliefs should prevail that will influence the HSE thinking and behaviors of the men and women that work there in the most constructive manner possible.
5. Communicate to all employees the results of the survey, including where perceptions match reality and where they don’t.
6. Communicate to all employees what the updated, 2002 version is. Enable people to interact with and discuss these values openly to insure their understanding and acceptance.

7. Set up a structure, if it doesn't already exist, or reinforce it if it does exist, for employees to 'safely' communicate to people who can do something about it, when they experience a discrepancy between what is said and what is practiced.

Other Components

What has become conventional wisdom in most companies today is that employees at all levels must be included in order to maintain and improve performance. A holistic approach emphasizes the importance of the whole and inter-dependence of the parts. Experience has shown that any one person or group cannot achieve a breakthrough alone. Moving beyond compliance means management and labor/line must continue to work as a team at new levels of cooperation and unity. Even though it may be known that everyone involved must be willing to communicate, coach each other and work together to prevent incidents, this doesn't always happen.

Knowing something is necessary or important doesn't mean that people are skilled in how to do it or if they are skilled, are willing to use what is known to approach and correct anyone's unsafe behavior regardless of his or her position. Experience over the years has shown us that many people are requested to or volunteer to accept HSE committee, or labor and management leadership positions without direct experience or training in specific leadership, communication, coaching, counseling, or other needed interpersonal skills to do the job effectively. Ongoing training in these skills, as well as, skills to manage and transcend personal resistance to using them to intervene with others, is surely needed.

Another primary ingredient in moving beyond compliance is personal responsibility. Responsibility implies ownership for taking HSE improvement to the next level. It also implies being proactive and taking action. Empowering people means involving them and recognizing their contributions. Once compliance with requirements is achieved, involvement must continue to maintain and further improve performance. It also means that you, regardless of your position, line or management, must be approachable, encouraging others, through your demonstration, that it's "OK" to talk about safety-related attitudes and behaviors.

Most training focuses on learning how we can interact and change the behaviors of others. What is needed is training on how we can observe our own management or leadership styles, and become aware of how we allow others (or not) to communicate or interact with ourselves. This is scary for some as it's safer to focus on others rather than our selves.

A proactive approach means taking a risk to step out and allow others to address us or to address someone else's behavior. Again, we can't assume that this is happening at a universal level rather than with a small group of involved people.

Non-people issues around safety are easier to address. Heightened awareness and practice in necessary communication (listening and non-judgmental communication skills are included here), along with the other people skills mentioned previously can ease this discomfort. A higher level of performance means labor and management leadership must be willing to hold others, as well as themselves, accountable for compliance. Knowing what to do does not mean that people do it. We have found this to be the case over and over and over again.

All Levels

As we've stated, for breakthrough performance, HSE improvement must impact all levels of an organization. These include:

- Self (individuals engage in self-observation, self-management and take personal responsibility for their own and others behaviors)
- Peer (co-workers provide interaction, intervention, and support)
- Leader (management and labor co-lead the improvement effort, including coaching and counseling any level of employee, contractor or visitor)
- Organizational (corporate and site leaders assure that HSE values and commitments are demonstrated consistently by all)

Achieving long-term change involves a complex array of components including raising awareness, shifting attitudes and beliefs, changing behaviors, and correcting workplace conditions. It's not a one-time "fix," but rather an ongoing effort that must be kept alive and lively for every shift, every day. The 'Law of Entropy' states that whatever we don't put energy into will eventually break down. Recognizing this, companies must continually resource the people, time, and money to continually improve. This is most likely to occur if it is perceived and communicated as a value by and to every member of the organization.

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Strategies for Creating Breakthroughs in Health, Safety and Environmental Performance

Developed by Topf Initiatives

1. CONTINUALLY ASSESS YOUR ORGANIZATIONS' HEALTH, SAFETY, AND ENVIRONMENTAL CULTURE. IDENTIFY BARRIERS TO FURTHER IMPROVEMENT. DETERMINE THE GAPS. INVOLVE ALL LEVELS OF EMPLOYEES TO DEVELOP STRATEGIES TO RESOLVE THEM.
2. DETERMINE IF HEALTH, SAFETY AND THE ENVIRONMENT ARE CURRENTLY VIEWED AS INTEGRAL PARTS OF THE PRODUCTIVITY PROCESS. ARE OTHER REAL TIME PRIORITIES AND BUSINESS ISSUES INTERFERING WITH INTEGRATING HSE INTO THE DAILY ROUTINE?
3. ENSURE THAT THE BASICS THAT ARE IN PLACE, SUCH AS, PROPER PPE AND HSE PROCEDURES ARE BEING USED BY ALL EMPLOYEES, CONTRACTORS, AND VISITORS.
4. CONTINUALLY EVALUATE AND DETERMINE EMPLOYEE PERCEPTION OF MANAGEMENT AND LABOR'S COMMITMENT TO HEALTH, SAFETY AND THE ENVIRONMENT. ADDRESS ANY DISCREPENCIES.

5. INCLUDE A CROSS-SECTION OF ALL LEVELS OF EMPLOYEES IN DETERMINING WHAT HSE CULTURE ENHANCEMENT AND BEHAVIORAL IMPROVEMENT APPROACH YOU WILL TAKE.
6. CONDUCT ROOT CAUSE ANALYSIS TO INCLUDE AWARENESS, ATTITUDINAL AND BEHAVIORAL CAUSES OF INJURIES AND INCIDENTS, AS WELL AS, UNSAFE CONDITIONS AND EQUIPMENT.
7. EDUCATE AND “SELL” LEADERSHIP ON THE NEED TO IMPLEMENT A BEHAVIORAL PROCESS FOR ALL EMPLOYEES. ENCOURAGE THEM TO COMMIT ADEQUATE RESOURCES TO MAINTAIN YOUR VISION.
8. DON’T FOCUS ON THE NUMBERS. DRIVE OUT FEAR OF REPORTING. FOCUS ON ACTIVITIES AND BEHAVIORS THAT WILL PREVENT ACCIDENTS, INJURIES AND HEALTH/ENVIRONMENTAL INCIDENTS. REPORT INCIDENTS IN HUMAN TERMS RATHER THAN NUMERICAL. SHOW CONCERN FOR PEOPLE, AND THE ENVIRONMENT, NOT THE STATS, IF INCIDENTS DO OCCUR.
9. POSITIVELY REINFORCE CONSTRUCTIVE ATTITUDES AND BEHAVIORS BY PRAISING THEM INDIVIDUALLY AND PUBLICALLY. REWARD ACCOMPLISHMENT BY INCLUDING HS&E CONTRIBUTIONS IN PERFORMANCE APPRAISELS.
10. PERIODICALLY ASSESS THE SYSTEMS AND STRUCTURES THAT SUPPORT HSE PARTICIPATION. ARE THEY DOING WHAT IS INTENDED? ROTATE LEADERSHIP POSITIONS AND COMMITTEE MEMBERS. ENCOURAGE PEOPLE TO GET INVOLVED BY HAVING THEM UNDERSTAND THE OPPORTUNITY AVAILABLE TO CONTRIBUTE AND MAKE A DIFFERENCE.
11. MANDATE HSE BEHAVIORS BE CONTINUALLY INTEGRATED INTO THE DAILY ROUTINE. REINFORCE THE NEED FOR MANAGEMENT AND LABOR LEADERS TO LEAD AND SUPPORT THE EFFORT IN EVERY SITUATION. DON’T ASSUME IT WILL MAINTAIN A CONSTANT LEVEL OF IMPORTANCE FOR ALL.
12. INSTILL HEALTH, SAFETY AND ENVIRONMENTAL EXCELLENCE AS A KEY VALUE. MAKE HSE CONCERNS AND PERFORMANCE A PART OF ALL BUSINESS CONVERSATIONS.