

“Your Actions Speak So Loudly I Can’t Hear a Word You Said”

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Introduction

The title of this paper is a paraphrase of Ralph Waldo Emerson’s quote, “Who you are speaks so loudly I can’t hear what you’re saying.” These words have always been important to me because I think they get to the heart of what really matters to people. What defines who you are? What you do and how you spend your time reveal what’s truly important to both individuals and organizations.

I work for NOVA Chemicals and we value continuous improvement in safety. We are members of the American Chemistry Council and Canadian Chemical Producers Association, and both organizations are committed to Responsible Care. Responsible Care is a global industry performance initiative that helps companies go above and beyond government requirements and share our results with the public. Our employees develop and manufacture plastics and chemicals for customers worldwide that produce consumer, industrial and packaging products. There are hazards associated with these processes and as such, “safe, reliable operations” is a fundamental value of our business. This value led us to develop a tool that has improved safety in our company and can do the same for your company as well.

So you can see that talking about being committed to safety and sharing ideas are the first steps, but spending time and effort to improve safety is what really makes the difference and demonstrates a much higher level of commitment- in both our work and personal lives. Safety actions, demonstrated by leadership, should energize employees to seek ways to reduce rather than accept risk. We want all employees to “walk the talk” and do the things that keep each other safe. That’s why it’s so critical for leaders to set an example and ingrain safety values into the company culture by influencing others through their commitment to safety. Quite simply, employees care about what their leaders care about. When everyone is paying attention to safety, the result is the reduction of incidents.

A safety professional's ability to reduce incidents is limited unless we influence leadership to expect and demand safety excellence from all. The key is for the safety professional to convince leaders that their efforts will make a difference with their workers, that their activities and commitment will be measured and noticed, and ultimately worker safety will be improved. Once "the boss" invests their time and effort to achieve safety, the rest of the organization will follow their lead.

To help achieve these objectives at NOVA Chemicals, we have developed the Safety Leadership Perception Survey (SLPS). This survey is a simple, efficient tool that provides a measurement indicator for leaders' proactive safety efforts as opposed to the traditional reliance on measuring failures (incident rates). The goal of this paper is to share information about our SLPS process and to teach others to develop a Safety Leadership Perception Survey tailored for their organization.

The Drivers for the Safety Leadership Perception Survey (SLPS)

Four years ago NOVA Chemicals conducted a safety culture survey that was very enlightening. A significant learning from this survey helped us to understand workers' perceptions of how leadership ranked safety alongside quality, cost and production. The survey revealed that leadership ranked safety first, but that workers still believed leadership actually ranked it third in importance. Our management felt that this perception was unacceptable, and the situation provided the impetus for some much-needed change. Many companies would have been satisfied with our systems and injury rates, but we felt that there was still room for significant improvement. To further reduce incidents, we needed to change the perception of workers regarding leadership's concern for their safety and to develop a strategy that would allow us to continuously improve our safety performance.

Safety professionals strive to effectively measure safety activities because they are good leading indicators of proactive efforts. However, senior leadership is bottom-line oriented and pays for results as opposed to activities. This is why they value injury rates as indicators of safety performance. Our challenge was to create a system and/or tool that could measure the effectiveness of the activities that produced low injury rates. It would also have to contribute to safety improvement, satisfy leadership's demand for results and change the perception of our workers regarding our care for their safety.

Developing the SLPS

Our first step was to understand the best way to gather this information and who would provide it. It quickly became clear to us that employees were best qualified to evaluate leadership's safety activities, as they are the ones who benefit the most from them. We found that most employees are comfortable with the short survey format and are interested in providing feedback to their leaders on how he/she is perceived regarding safety - as long as they can do so anonymously.

The next step was to have our safety professionals generate a list of what they thought were the ten most important safety activities for leaders. This list was then reviewed and revised by the Site Leaders themselves. Once we agreed on a concise set of questions a scoring system was

developed. The highest score (most favorable response) to the question earned 7 points and the lowest score (least favorable response) earned 1 point. All ten responses were then totaled and divided by ten to determine the average score. Survey numbers were then wrapped up and an average score determined for each survey owner. The SLPS results are reported for individual leaders (survey owners), individual sites and company-wide.

The final step was completed with the assistance of our Information Technology group, who helped us with the development and distribution of an automated e-mail that linked to our web-based survey. The e-mail encouraged workers, peers and leaders to assist in anonymously scoring each leader regarding their performance in the 10 key safety activities. The survey was designed to take less than 5 minutes, so it could be completed with little difficulty and we felt confident of a high participation rate.

The system was set up to automatically score the results and simply and cleanly present the information in both graphic and numeric formats for easy analysis and interpretation. Data was also available to track changes in scoring from year-to-year. Accurate and easily understood data was critical in meeting the requirements of senior leadership. In addition, this data was the motivation for leaders to demonstrate their commitment to safety activities to workers, peers and other leaders throughout the course of the year.

2007 SLPS

Our complete survey from last year is presented below. More than 1700 surveys were completed in 2007- a 35% increase from the previous year. Leaders from your organization can develop a similar survey based upon the activities they think make the greatest contribution to safety performance.

2007 NOVA Chemicals SAFETY LEADERSHIP PERCEPTION SURVEY

1. This leader/team leader/ coordinator demonstrates visible, active, safety leadership by regularly spending meaningful time fostering open dialogue about safety with employees.

7) very strongly agree 6)) strongly agree 5) agree 4) neutral 3) disagree 2) strongly disagree 1) very strongly disagree
2. This leader/team leader/ coordinator has developed a Personal Safety Action Plan that he/she applies regularly.
3. This leader/team leader/ coordinator regularly addresses hazardous conditions and supports and/or initiates safety improvements in our work area.
4. This leader/team leader/ coordinator has been an active participant in team safety meetings as scheduled for the group.
5. This leader's/ team leader's/coordinator's safety meetings that he/she facilitates/participates in are well prepared and meaningful to me. (Consider meeting preparation, understanding of

current safety performance, tips to reduce job hazards, business impact and sincere interest in the topic when evaluating.)

6. This leader/team leader/ coordinator is actively and sincerely involved with incident investigations, completion of recommendations and closure of incident reports in his/her area of responsibility.
7. This leader/team leader/ coordinator regularly encourages me/others to participate in safety activities such as hazard reviews, safety observations, Planned General Inspections, Incident Learning Process meetings, safety committees, etc.
8. This leader/team leader/ coordinator routinely provides positive reinforcement and recognizes/applauds others for their contributions to improving safety.
9. This leader/team leader/ coordinator personally demonstrates compliance with all safety rules and safety procedures.
10. This leader/team leader/ coordinator contributes and supports me/others in resolving safety concerns and reducing risk.

Using the Results of the SLPS

The SLPS enables leaders to receive anonymous feedback from employees and peers in a constructive way in order to better understand others' perception of their efforts to lead and support safety performance improvements. This empowers them to either continue what they are doing or work with others to improve in areas where they need assistance. The SLPS process has been so successful that NOVA Chemicals' manufacturing sites have been using this tool for the past 3 years.

2007 SLPS results:

- The average score for the company was 5.6 out of a possible 7 points (81%). This indicates that, on average, employees either "Agreed" or "Strongly Agreed" with the questions raised in the survey.
- The highest scores for the company were for Question 9, (Leadership compliance with rules and procedures) and Question 10, (Leadership supports me in resolving safety concerns). The score for these questions was 5.9 out of 7 or 84%.
- The lowest scored questions for the company were for Question 8 (Recognition for safety contributions) and Question 2 (Personal Safety Action Plans implemented). The score for these questions was 5.3 out of 7 or 76%.

Based on this information, we need to show more emphasis on:

- Recognition for safety efforts to ensure employees understand that their contributions are valued
- The development of Personal Safety Action Plans across the company.

Follow up work for the SLPS

A summary report is issued to inform the rest of the organization on the results and comparisons amongst years, locations, and departments when the annual SLPS is complete. Effective follow up by all involved is necessary to ensure the results are meaningful. Some suggestions on how to share this information are as follows:

1. Each Survey Owner (person surveyed) reviews their SLPS feedback (results).
2. Leader and Survey Owner review their SLPS results to recognize performance, provide encouragement and discuss the path forward. The most effective comparisons are made by checking the survey owner's scores to average scores at their site.
3. Each Site Leader reviews the individual scores of their team to congratulate the top performers, establish action plans for those leaders that need some improvement in a safety activity, and to communicate plans for next year's SLPS.
4. Each Survey Owner reviews their survey results with their team to:
 - Express appreciation for their feedback
 - Discuss any specific plans intended for improvement
5. Role for the Site Safety Professional:
 - Review survey owner's SLPS results
 - Compare scores within the survey owner's site. This can be useful, but comparing scores from site to site or against a company average can result in discussions that center more around rankings instead of the feedback itself. This situation should be avoided because of the potential differences in leader expectations and culture differences between sites.
 - Share tips on how to be perceived better from a safety perspective
 - Provide direct feedback by observing survey owner's safety meetings
 - Coach survey owner on preparing and conducting safety meetings and incident investigations
 - Facilitate involvement in behavioral based safety and job assignment process
 - Assist survey owners with their improvement plan to build stronger relationships and influencing capability with line leaders. This includes training and coaching on the safety activities that require improvement.
6. Role for Corporate Safety: Leaders and/or sites with lower scores can utilize a safety coaching intervention process led by corporate safety professionals that may include:
 - A review of the SLPS results for individual leaders and the site as a whole
 - Direct feedback by observing their safety meetings
 - Behavioral based safety involvement and job assignment process
 - Tips on how to be perceived better from a safety perspective
 - How to prepare and conduct safety meetings and incident investigations.

Two sites received the safety coaching interventions process using SLPS data as described above. At the first site, the 2005 Employee OSHA Recordable Incident Frequency Rate was the worst in the company in at 2.6. The intervention process was initiated in early 2006 and at the end of the

year, their employee OSHA Recordable Incident Frequency Rate was down to 1.25. At the second site, the 2006 Employee OSHA Recordable Incident Frequency Rate was 2.8. The intervention process was initiated in early 2007 and at the end of the year, the site employee OSHA Recordable Incident Frequency Rate was down to 1.5.

Finally, please remember that follow-up is a critical part of the SLPS process, as this is the time where the data from the survey can be shared and utilized to drive positive change – particularly in terms of the individual survey scores.

SLPS Impact on Incident Rates

The SLPS process has contributed to the reduction of incident rates, with the enterprise-wide Employee OSHA Recordable Incident Frequency Rate dropping in each of the past four consecutive years from 0.82 in 2004, to 0.72 in 2005, 0.59 in 2006, and our lowest rate ever, 0.57 in 2007.

Year	2004	2005	2006	2007
Rate	0.82	0.72	0.59	0.57

Concerns about the SLPS Process

Some survey experts may diminish the value of the questions if there is no predictive value associated with them. This concern has merit, but if a company's safety professionals and leadership have determined that the activity referenced in the question is important for safety, then the score (results) for the question has significance regardless of its predictive value.

There have been some sites that scored well on the site SLPS, yet experienced a higher Employee OSHA Recordable Incident Frequency Rate. This is not typical, but one possible explanation is that when employee's expectations for leader's safety activities are lower, the SLPS scores tend to be comparatively higher.

When the SLPS concept was introduced, there was some organizational reluctance. A few leaders were concerned that some employees might not be truthful with their survey responses because of a personal grudge that could result in more negative responses. Another concern was that if employees doubted the survey's anonymity, they might tend to generate more positive responses. While these are valid concerns, it is difficult to determine if they are a factor. However, now that the SLPS is ingrained in our culture, these issues are rarely raised.

It is important to note that safety professionals and chemical manufacturing leaders, not experts from the professional survey industry, created the SLPS. Part of the effectiveness of this tool is that it can be developed and implemented by your organization's in-house professionals with little assistance. After getting the SLPS off the ground, it can certainly benefit from a critique by a professional survey organization to help ensure its ongoing effectiveness.

Summary

Applying the SLPS results is important so that employees and leaders know that these processes, along with safety performance, are expectations for working at NOVA Chemicals. Information gathered from the SLPS can be used in everything from annual performance reviews, compensation decisions and career dialogues to sharing with work teams and helping to develop personal safety action plans. All of these activities help to anchor the SLPS – and more importantly, the focus on safety - into our company culture. The SLPS results provide a safety “leading indicator” measurement tool that must be earned by the leader and recognized by the very people they are paid to protect.

Taking the time to provide and apply this feedback assists leaders, individual sites and NOVA Chemicals in our pursuit of zero injuries and illnesses. As Dr. Jim Stewart, author of the book Managing for World Class Safety said, " In the very safe companies, the priority given to safety is viewed as a critical issue. They believe that one of the strongest factors that predicts safety performance is *the perception of workers about the commitment of their management to safety*".

Bibliography

Peterson, Dan, *Techniques of Safety Management*. 2d ed., McGraw-Hill Book Company, 1978

Stewart, J.M., *Managing for World Class Safety*. John Wiley & Sons, Inc, 2002

Geller, E. Scott, *The Psychology of Safety*. Chilton Book Company, 1996