Session No. 713

Separating the Wheat from the Chaff— An Analysis of Safety Management Strategies in 2008

Tom Harvey, CSP
Allied Safety Associates
West Columbia, South Carolina

Introduction

With the explosion of safety-related information and improvement strategies, it is becoming increasingly difficult for safety professionals and organizations to discern highly beneficial efforts from less valuable approaches. Applying the age-old axiom of "separating the wheat from the chaff", a variety of separation strategies will be explored.

A primary objective for safety professionals and their organizations is to gain greater insight into the pros and cons of the myriad approaches, terminologies, programs, and issues that influence contemporary safety practice. As this objective is met, safety professionals and their organizations will be able to better evaluate the relative value, strengths, weaknesses, advantages and disadvantages of various strategies so they can successfully employ activities that deliver the greatest benefit to their organizations.

Separation Strategies

For the practice of safety to advance, constructive dialogue, candor, and healthy debate of the merits of various approaches to safety management must take place. As the discourse proceeds, greater efficiencies and the pace of safety advancement will result.

Safety as a Profession and a Practice

Separate the practice of safety from other unrelated disciplines.

Safety management is different from other business functions – it can't simply be integrated into them. Where synergies are logical, they should be leveraged – but there are great limitations. Comparisons with other disciplines illustrate this point. Quality is an important part of production or service, but it is also a separate discipline requiring different types of expertise. Manufacturing personnel must understand quality, but quality assessments still must be performed as the product

is being made, and in labs to understand the effects of factors that determine product or service quality. Similarly, other business functions are even more separated. Human Resources is obviously a distinct discipline that is managed separately. The same holds true with Legal, Sales, and Supply Chain Logistics. Differing degrees of proficiency are needed by everyone to effectively manage a business, but specialized technical expertise is required for individual business functions. Safety management is no exception.

Instead of buying into the irrational notion that safety should be integrated into other business functions, safety professionals should be advancing the reality that safety management is extremely difficult and complex, and great effort is required for success. As long as there is competition among all business disciplines for scarce human resources, the characterization of safety as a discipline that can be integrated is very shortsighted and counter-productive.

Regulatory compliance must be a given. More importantly, the intent to comply must be ever-present. When the intent to comply is present, non-compliance will be found and corrected. When organizations with mature safety processes become over-confident about their compliance, insidious deficiencies will creep into the process. They may brag about catchy programs that serve as nice window dressings, while regulatory compliance declines. Even as OSHA frequency rates are remaining low, the whack on the head usually happens with a serious injury or other major incident. The warning signs are usually prevalent but the right type and amount of diligence is not being paid. There is a false sense of security.

Many safety practitioners have exacerbated their professional image problem by allowing psychologists promoting behavioral-based approaches to co-opt far too much control and financial and human resources. After exhausting their limited real-world knowledge, and wreaking havoc in many companies, these doctors of safety-spin have now resorted to expanding their limited knowledge of safety into other safety systems.

These are the challenges facing the safety professional in today's business environment. These are the challenges that have generally been avoided. The result in many organizations is that safety is managed as a second-tier function. To offset this disparity, safety professionals and safety leaders must become more assertive. They need to learn how to effectively demand the resources to mange their safety process. Instead of assuming, "We don't have the money for that," they need to make a business case for procuring the resources. They need to make the person holding the purse strings say no--in writing, if necessary. In certain cases they may need to put their job on the line to create the value of safety that will dramatically impact the safety culture.

Safety Performance Measurement

Separate legitimate safety performance measures from the requirement to maintain OSHA recordable injury statistics.

Determining accurate methods of measuring safety is a monumental challenge and unfortunately, no widely accepted method has replaced frequency rates of OSHA recordable injuries and illness. This inaccurate, arbitrary, and downstream measure has been the impetus for much chaos in the field of safety. Using OSHA recordable rates distorts the true picture, measures failure, is reactive, and motivates companies to make bad decisions. Frequency rates are trailing indicators, but are the most popular game in town because it is the law.

The use of OSHA recordable frequency rates become increasingly detrimental as rates become lower and lower. The lower the rate, the greater the impact one OSHA recordable has on the rate. The greater the impact, the more consternation and chaos ensue. Absent more meaningful data, there can be a perception that the safety process is broken and something must be done, now!

Consequently, inordinate time and resources are consumed reacting to an OSHA recordable injury without regard to incident severity or hazard potential. When an employee's hand is cut and two sutures are required, excessive resources may be diverted to figure out how to prevent any more cut hands. With the emphasis on OSHA rates, efforts to correct hazards with much greater injury potential, such as fall hazards or zero-energy violations, are neglected. For managing risks and resources effectively, incident severity and hazard potential are more important factors than frequency rates alone.

Management likes frequency rates because it gives them a number. However, rank and file workers very much dislike distilling safety performance down to a number for several reasons: most employees don't understand rates; they don't care about it; they think management is only concerned with the number and not them; and it is a factor over which they have little or no control. Accordingly, basing safety performance on frequency rates is a blunder because they are not a good measurement, they have a negative effect on employees, and they lead to bad decisions.

All the time and effort recently spent by OSHA revising this inveterate system would have been much better spent devising meaningful metrics targeted at critical upstream safety indicators. Accurate data proactively measures performance by assessing and improving the principles, key elements, best practices, and systems of the safety process.

Safety Process Elements

Separate good training from bad training.

For most organizations, safety training and safety meetings are a very significant expenditure of time, money, and effort. Quite often, those being trained are being paid premium overtime rates. With this financial factor in mind, a cost-benefit analysis of safety training programs in many organizations fare very poorly. Trainers are incompetent, attendees are bored, learning does not translate to safer performance, and large amounts of money are wasted. These are the deficiencies that must be reversed to improve in this element.

Separate good auditing from bad auditing. Separate methods of determining true systemic deficiencies from mundane, time-consuming, and ineffective activities.

Another safety activity that requires significant time, effort, and money is auditing. To gain the most benefit, a balanced approach is needed. And the balance must be split between the three components of risk – workplace hazards, employee actions, and control systems. Each of these components is quite complex. Workplace hazards include physical hazards such as unguarded crush points, and poorly designed/maintained equipment. While it is important to identify and correct these hazards, many organizations spend an inordinate amount of auditing time on physical hazards. Physical hazards will always exist, and they will never be completely

eliminated. A set of stairs can be perfectly designed, but inherent hazards still exist. Equipment breaks, machinery fails.

Auditing efforts must also focus on actions of employees and control systems. Behavior-based safety addresses the component of employee actions and this is a good start, but it must be kept in balance since it basically addresses one component of one element of the comprehensive safety process. Good employee action auditing includes engaging employees in discussions about the hazards they face, the shortcuts they are tempted to take, mental states that affect their performance and the performance of their coworkers, and other safety factors of their job. Control systems are everything we do to prevent accidents and are defined as sub-systems within the 5 Core Principles and 10 Key Elements. Many methods and techniques are available to evaluate these systems. Whether the audits are regulatory compliance or management systems, they are all dependent on the intent of the audit and ability of the auditors to see the real picture. Where there is an 'us versus them' mentality, the likelihood of getting accurate results is small.

Separate good incident investigations from bad incident investigations.

Most accident investigations are poorly done. Facts are not determined, evidence is mishandled, superfluous data distorts critical information, witness interviews are improper, superficial root causes are noted while system failures are not addressed, human error is assigned too much blame, corrective actions do not follow the hierarchy of controls, are some of the more commonly found problems. Proper accident investigations accurately determine what happened, why it happened by evaluating the components of risk – hazards, employee actions, and control systems, and what corrective actions must be implemented to prevent similar accident potentials from recurring. A great deal of training and proficiency is needed by investigators to have an effective accident investigation process.

Separate good accountability systems from bad accountability systems.

Because the management of safety is so difficult, systems must be in place to ensure that resources are appropriately allocated and that all employees are engaged. Essentially, the purpose of an accountability system is to identify everything that needs to be done and to make sure that it gets done. This is a perfect opportunity to integrate with the accountability system of the organization, assuming there is one in place. Otherwise, a separate system must be developed. Whether or not an existing accountability system is used, the important part is to understand all that must be done and turn these items into action plans. This is much more than just including a rating for safety in a performance appraisal system.

Decisions must be made to delineate responsibilities between the technical safety staff, the line organization, safety teams, management, formal and informal leaders, and all other personnel. One objective is to assign meaningful duties to each employee. All personnel in all departments should be included for maximum effect. Duties should be assigned so they reflect the 5 Core Principles and 10 Key Elements presented here.

Finally, the relationship between responsibility and authority must be taken into consideration when establishing the accountability system. For good reason, the first thought some people have when accountability is discussed is that someone will be blamed when things go wrong. For this

reason, responsibility and accountability must be balanced. Accountability, without the authority to control one's destiny, is blame!

Separate the human and motivational aspects of safety from regulatory compliance mandates.

Reward, recognition, reinforcement, and incentives ("RRRI") are powerful motivators and their impacts must be clearly understood. When employees understand and meet their performance expectations, they should receive some form of RRRI. The proper administration of RRRI for safety achievements will develop strong safety values among employees. Conversely, the misuse of RRRI can be extremely detrimental. Quite often, unsafe and at-risk activities are positively reinforced, condoned, ignored, and therefore implicitly approved. The resulting negative impact on safety culture is usually not recognized or understood. RRRI should not be given for reaching targeted OSHA frequency rates. Random-drawings, grand prizes, and giveaways are also not desirable. All RRRI must be earned.

Promoting safe lifestyles has many benefits. Employees with a 24-hour safety mentality who practice safety on and off the job and are physically fit are more likely to remain injury-free. Activities that promote wellness, injury prevention, and family safety should be developed. Employee assistance programs for troubled employees should be available, and fitness-for-duty requirements should be established.

Conclusion

This session is designed to promote constructive thought that challenges the pack mentality that pervades the practice of safety. Separating the wheat from the chaff means gaining a greater understanding of approaches that work best and applying these methods, while at the same time eliminating those approaches that have minimal or detrimental effects. Achieving success will result in much improved and higher-valued safety processes.