Rightsizing
Risk Management
For Small & Medium Enterprises

By Pamela Walaski

An evolution is underway in how OSH professionals practice. Looking back about 10 years, many of the profession's thought leaders began to postulate that the compliance-based approach to developing workplace safety programs had run out of steam, so to speak. This thinking was based, in part, on data that showed a slowing in the reduction of fatalities. In some categories and years, the data also showed an increase in serious injuries (those that result in permanent disability or long periods off work) (BLS, 2016).

This introspection also stemmed, in part, from the fairly common occurrence of large organizations with large OSH budgets maintaining low, very low or zero incident rates for less-serious injuries (i.e., OSHA recordables), yet still experiencing multiple fatalities or significant catastrophes (i.e., serious injuries to multiple people or significant property damage). In-depth investigations of these catastrophes conducted by outside panels revealed significant flaws in the implementation of safety programs that had been well-regarded within the organization, the safety community and third-party reviews. The reports often identified substantial and repeated warning signs of imminent catastrophe that were often ignored or not given the level of seriousness they deserved (CSB, 2015; 2016; NASA, 2003).

Further, investigation revealed that significant incidents in organizations large and small were often directly caused by a failure to control obvious hazards or use standard safety practices (e.g., tying off while working at heights, using lockout/tagout when servicing machinery, failing to use protective systems in excavations) (Manuele, 2008).

These awakenings sparked many formal and informal conversations among OSH professionals about the cause of the dichotomy, which led to subsequent review of the basic tenets upon which most OSH programs were based. Many concluded that the OSH profession was mistaken in its belief that focusing efforts on reducing the frequency of minor incidents would lead to a simultaneous reduction in incident severity (ISHN, 2012). In addition, many realized that companies were relying on low-level controls (e.g., PPE, training) to control highly hazardous conditions. This was a clear beacon of the failure to address hazards with controls that did not rely on complete worker compliance. Finally, a general belief began to emerge that incident investigations rarely identify the direct cause or any causes beyond worker behavior, which led to frequent recurrence of those incidents (Manuele, 2008).

As OSH professionals discuss and debate the subject, a broad consensus has emerged that compliance-focused approaches are not effective enough at managing workplace risks, no matter how well-intentioned the underlying regulatory framework. Large multinational organizations have come to embrace the use of a risk management approach to address workplace hazards, which has been used in Europe for many years. This approach forms the foundation of International Organization for Standardization's (ISO) risk management standards, first published in 2009 and adopted by ANSI in 2011 through ASSE, its secretariat and representative to ISO (ANSI/ASSE, 2011a, 2011b).

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Risk management approaches have substantially shifted the way that large organizations operate and approach OSH; many have invested vast resources to train staff to be effective risk managers and to take the lead in implementing this approach. In the author's experience interacting with organizational leaders, many would say the results are worth the cost.

But where does that leave most smaller organizations that may be without the needed resources to develop and implement the comprehensive requirements of a standard such as ANSI/ASSE Z690? Can these organizations hope to accomplish the same success as their large counterparts? According to guidance from ISO, small and medium enterprises (SMEs) are not typically engaged in the risk management process (Lark, 2015, p. 8). The reasons vary, but the likely culprits are limited resources and awareness.

Defining SMEs

The U.S. Small Business Administration (SBA, 2016b) defines an SME as an enterprise having between 100 and 1,500 employees, depending on the organization's North American Industry Classification System (NAICS). Using that definition, the number of SMEs in the U.S. is roughly 28 million and, while many of those are home-based businesses employing one or two people, SMEs employ approximately 54.5 million U.S. workers, or about 54% of the private workforce (SBA, 2016a). The U.S. is not alone in this regard (Figure 1, p. 64). Canadian SMEs employ 10 million workers or 90% of the workforce (Government of Canada, 2016) and in the EU, roughly 10 million SMEs make up 90% of all enterprises and employ 66% of all workers (World Bank, 2016).

While evidence exists that many SMEs put various loss prevention/reduction measures in place, they do not often implement a formal risk management process (Lark, 2015). Conversely, while SMEs are more exposed to the negative aspects of risk, they are more able to adopt a risk management framework due to their flexibility, stemming primarily from their size, which also makes them more able to adapt quickly. By learning and applying risk management concepts, Lark (2015) believes that SMEs can grow more rapidly and effectively.

If all of this is true, why would SMEs not want to get on board? Any size organization can develop and implement an effective risk management program by understanding the larger picture of risk management's essential concepts, then rightsizing as needed.

Becoming a Risk Expert

Going from complete absence of a risk management process to a fully functioning program can be daunting, even more so for SMEs that do not employ a dedicated OSH professional or employ one with limited years of experience or certifications. The best recommendation for any organization, but especially for SMEs, is to tackle one aspect of the process at a time.
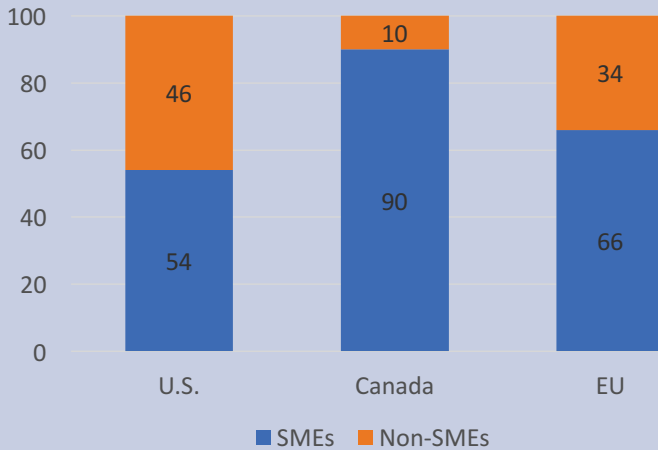
The first step for many SMEs is often having the presence of an OSH professional who believes the process is important and takes up the cause (see "OSH Thought Leaders" sidebar, p. 65). OSH professionals who wish to lead such an effort in their organizations must start by becoming the internal

IN BRIEF
•The use of risk management approaches has become more common among organizations, particularly those with large global footprints and OSH departments, but the approach may be less common among smaller organizations in which the number of dedicated OSH professionals is limited.
•By focusing on an overarching framework, this article helps OSH professionals in smaller organizations identify the first important steps they can take to lay the groundwork for implementing risk management.
•This article provides a step-by-step approach for OSH professionals in small- and medium-size organizations that are trying to implement a risk management process by scaling it to their needs.

Percent of Workforce in SMEs

However, while that knowledge is valuable, an OSH professional who seeks to lead the SME's effort to reframe the view of the OSH program at all levels of the organization must be able to talk about risk sources, risk appetite, trigger events, consequences, probability and similar terms that form the foundation of risk management.

The upside of this shift is that many management-level members of the SME already use the language of risk, whether it is the chief financial officer discussing the risk of capital expenses and expansion plans or the purchasing agent identifying the risk of supply-chain disruption. For years OSH professionals have expressed a desire to better engage their corporate management team. The good news is that speaking the language of risk, rather than DART rates and OSHA regulations, is more likely to advance that cause. Lark (2015) says that "organizations with clear accountabilities and good internal communication often have a culture that is receptive to implementation of risk management" (p. 8).

Also note that risk management is not the sole purview of OSH. The ISO standards on risk management were not written solely for managing OSH risks. Rather, they are intended to help organizations manage all risk, regardless of the source. The common use of an enterprise risk management approach as "a strategic business discipline that supports the achievement of an organization's objectives by addressing the full spectrum of its risks and managing the combined impact of those risks as an interrelated risk portfolio" is a similar concept (RIMS, 2017).

Conduct a Gap Analysis

Once an OSH professional has established him/herself as a risk management expert, the next step is to identify the organization's status in relation to its approach to risk in general and OSH risk specifically. Performing a gap analysis is an effective method to determine this. The results can be used to develop a customized risk management plan that addresses the means and methods required to make the transition. ISO has published a guide for SMEs that provides helpful information on this process (Lark, 2015).

Information required to complete an effective gap analysis can be thought of in two spheres. The first is information about how the SME functions that the OSH professional already knows from working there and through informal sources such as interviews and meeting attendance. The second is gained by detailed analysis of formal sources, such as written policies and procedures or other types of written documents. Both spheres will enable the OSH professional to determine what risk management principles are already in place and to what extent. Once completed, a gap analysis relative to risk management seeks to answer the following broad questions:

•How does the SME gather and use information related to operations? Who is responsible for gathering this information and what is gathered?

OSH risk management expert if they do not already have experience or knowledge. This means reading and developing an understanding of the current standards. At the top of the list would be the ANSI/ASSE risk management standard series, including:

•Z690.1-2011, Vocabulary for Risk Management (U.S. adoption of ISO Guide 73:2009);

•Z690.2-2011, Risk Management: Principles and Guidelines (U.S. adoption of ISO 31000:2009);

•Z690.3-2011, Risk Assessment Techniques (U.S. adoption of IEC/ISO 31010:2009);

•ISO/ANSI/ASSE TR-31004-2014, Risk Management: Guidance for the Implementation of ISO 31000.

In addition to the standards directly associated with risk assessment, developing additional expertise in OSH management systems (OSHMS) is critical. Risk assessment is the "plan" part of the plan-do-check-act cycle of continuous improvement upon which all OSHMS are built. Developing an understanding of how it all fits together is critical for someone who wants to lead a risk management effort, and an OSH professional will greatly benefit from becoming familiar with ANSI/ASSE Z10-2012, Occupational Health and Safety Management Systems. In addition, the primary goal of risk assessment is to reduce an organization's OSH risks to an acceptable level through the application of controls. Higher-level controls associated with designing out the hazard are the most effective and are addressed in ANSI/ASSE Z590.3-2011 (R2016), Prevention Through Design Guidelines for Addressing Occupational Hazards and Risks in Design and Redesign Processes.

A final critical step in becoming a risk expert involves learning to speak the language of risk. OSH professionals are typically well versed in talking about days away, restrictions and transfers (DART) rates, total recordable incident rates and job safety analyses. Many can cite OSHA's detailed requirements for guardrails or fall protection systems.

What internal and external information sources are used? How is the information disseminated to internal and external stakeholders?

•How does the organization address market uncertainty? How does it plan for growth?

•How does the company create and protect the value of its operations and assets? How does it protect the integrity of its assets and supply chain? Who identifies threats and opportunities, and who develops and implements plans to address them?

Because the OSH professional has become an expert on risk and implementing OSH risk management, applying the knowledge gained from gap analysis provides the understanding needed to envision aligning existing OSH and non-OSH risk management processes. Knowing the answers to these questions will help the OSH professional determine the amount of work required to integrate OSH risk management into the business. A company that lacks the ability to implement any type of risk management will require a more complicated and time-consuming road map to move it toward integrating that approach. However, integration will be simpler for a firm that already has robust non-OSH risk management.

As noted, several informal resources are available to gather the required information. Setting up structured interviews with key management staff can allow the OSH professional to both gather information and gauge the readiness and willingness of key personnel to endorse and participate in the process. The interviews should include operations staff such as plant and operations managers, along with support staff such as accounting, purchasing and management. In addition to formal interviews, the OSH professional who is now well-versed in risk management will be better equipped to listen for and interpret information from operational and strategic planning meetings.

OSH professionals can use myriad resources and documents to collect formal information. The following policies, procedures and processes are likely already in place and easily accessible.

•Strategic plans. An SME's strategic plan is important not only because risk management processes should be aligned with it, but also because it provides clues on how the organization generally views risk, and how it intends to grow and develop over time. It provides a framework for understanding how the firm has assessed the risks to its operations in the coming years and how it plans to address them. It answers questions regarding the company's overall approach to risk (e.g., whether it is risk averse, risk tolerant or something in between). Finally, a strategic plan that appears to pay inadequate or inappropriate attention to risks provides important clues about the firm's willingness to implement an OSH risk management process.

•Governance procedures. Organizational governance procedures provide information on activities the company uses to control its daily operations and clarifies lines of management responsibility, both of which are crucial for implementing and continuously monitoring a risk management

framework. Governance and risk management attempt to achieve the same outcome, but the latter considers risk (Lark, 2015, p. 20). Governance procedures may be overarching and complicated, which allows little room for independent decision making and action, or they may offer loose guidelines for management, which creates a risk-tolerant environment. Both scenarios offer information on the company's risk appetite.

•Budgeting procedures. Resource allocation processes and capital expense planning provide information on the way an SME views financial risk and the level it is comfortable undertaking. Most organizations have processes in place that determine and control spending levels. The amounts that dictate each level and the number of approvals required help define the company's risk appetite.

•Insurance policies. Formal policies and relationships with brokers provide clues about how much risk is held and transferred within the organization. Although many types of insurance are common or mandatory, companies have great latitude when determining how much coverage or what types of deductibles they elect, whether they are willing to be self-insured (e.g., medical care, workers' compensation) and how they insure against high-consequence/low-probability risks.

•Patents and trade secrets. These formal documents illustrate how the SME values its property

(intellectual and otherwise) along with the level of information technology security it has established.

•Marketing/public relations plans. These documents provide clues on how aggressively an SME promotes its products and services, as well as quantity of resources aimed at that process. They also reflect the importance of reputation protection to the SME.

•Communication procedures. Documents that address processes both within and outside the company provide information on its risk appetite. Assess whether the company has an open process in which information is shared broadly throughout and outside of the organization, or whether the firm keeps information within a small circle of senior management.

After using gap analysis results to address gaps and move the company toward a more robust risk management process, the OSH professional will have a clearer understanding of the SME's risk appetite, the "organization's approach to assess, and eventually pursue, retain, turn away from or take risk" (ANSI/ASSE, 2011a). Keeping that knowledge top of mind will be paramount as the process moves forward. The OSH professional will be able to use that knowledge not only to develop strategies and objectives that are aligned with it, but also to calibrate progress.

Engage Senior Management

Once these preparatory steps have been completed, the OSH professional is ready to engage senior leadership. As with any significant OSH program or endeavor, management commitment is essential to proceed. Without it, the overall risk management process will not likely achieve its objectives. A shift in organizational culture and values is required for a risk management process to be effective. Trying to implement such a process with partial support may be a waste of time and communicates a poor message to the workforce.

Some may argue that a partial process is better than none, and that taking the time to achieve full commitment is not necessary. Getting all management on board and engaged may not be essential. Often, gaining support of a few specific people can bring the others along. The well-prepared OSH professional is in the best position to determine whether sufficient support and commitment has been gathered.

Each SME's methods of engaging senior management will vary. This is another reason that OSH professionals who improve their risk expertise and understand the risk appetite in their organizations will be better able to assess the best course of action. When the OSH professional understands the importance of risk management for all of an organization's operations, senior management is more likely to create a climate in which advancing OSH risk management can gain traction. The gap analysis also provides additional understanding for the OSH professional, providing the information needed to identify the next steps.

Once the engagement process is underway, a critical task is development and adoption of a formal risk management policy. While each company policy is unique, Lark (2015) suggests that five critical elements are common to all:

1) commitment to consider risk in all decision making;

2) commitment to implement the 11 principles for effective risk management outlined in Z690.2-2011, Risk Management Principles and Guidelines;

3) clear statement of the risk management process objectives and how they will be measured;

4) statement of the roles and responsibilities of key personnel who will implement, monitor and review the risk management process;

5) clear commitment to provide the resources needed to implement the process (Lark, 2015, p. 24).

The fifth element requires additional discussion. One of the most challenging aspects of implementing any major change, not just a risk management process, in an SME is the ability to identify sufficient resources, including both time and money, to be successful. The resources for an effective risk management process must be available for the initial as well as the ongoing implementation. Necessary resources include:

•People. In addition to the OSH professional, enough members of the company must have sufficient experience and competence to implement the process. Further, the OSH professional's typical duties and those of the risk assessment teams may need modification to allow the necessary time to implement.

•Financial. The OSH professional must become an expert on risk, which may involve some

self-study but also time to attend external training. The controls agreed on during the risk treatment phase may require resources to purchase or implement.

•Systems. In smaller SMEs, the systems needed during implementation will likely be simpler and more easily managed by the OSH professionals or risk team, but there will still be a need to develop and manage documents. The completed risk assessments must be reviewed on an ongoing basis to ensure that they remain effective and accurate, and a tracking process must be developed once several assessments are completed. Most organizations utilize risk registers or logs to accomplish this. Fortunately for SMEs with a limited number of completed assessments, a spreadsheet is sufficient for this purpose.

It is nearly impossible to place a dollar amount on the financial resources needed to implement risk management in an SME. The organization's size and inherent risks posed by its work are the key factors that will drive the actual cost. In addition, the time needed for the OSH professional to become knowledgeable and skilled enough to implement will vary. However, SMEs typically have the advantage of fewer substantial risks and smaller overall operational costs, so the overall cost to get started is likely to be less. As noted, SMEs do not have to create a risk management process all at once, but rather can get the process started with a gradual allocation of resources.

Key Implementation Strategies

After laying the groundwork with senior management and developing and adopting an overarching policy, OSH professionals can turn their attention to implementation strategies. Four are presented here.

Identify Risk Champions

Every organization has OSH champions. They can exist at all staff levels and come from varied backgrounds. These individuals have a passion for workplace safety that is demonstrated vocally and in the way they perform their jobs. Coworkers can usually identify them, as can OSH professionals. Many OSH champions are already risk champions or, with an investment of time, training and experience, can be developed into them. They will form the core of initial risk assessment teams.

The OSH professional should also be on the lookout for employees who have risk management experience from previous employment, either from involvement with OSH risk management or from endeavors in related areas such as finance, marketing or stakeholder relations. Even if the risk champions lack experience, they may intuitively understand the goals of risk management.

Finding or developing champions creates excitement for the process that can spread throughout the organization. This will help germinate the culture transformation that is essential to achieving the overall goals (Lark, 2015, pp. 92-93).

Train the Team & Lead Them to Success From the Start

Conducting risk assessments should not be undertaken with a team that is not properly trained. Even if the team members have experience and training, it is critical to ensure that they have a common framework for understanding the process and the intricacies of how it will be implemented in the organization. As noted, an OSH professional who expects to lead the effort will benefit from becoming an expert on risk, and while risk assessment team members do not need a similar expertise level, they need to be trained.

Before developing the internal team's skills, OSH professionals may benefit from additional training. ASSE's Risk Assessment Certificate program can provide a novice OSH professional with a solid background (ASSE, 2016). Such a certification may be critical to an OSH professional with limited direct experience in risk management. Other external resources are available for training risk assessment team members, although few specifically address how to train a risk assessment team. Alternatively, the OSH professional can design and deliver a session internally. While time-consuming to develop, session content can be customized to meet the SME's needs and can be delivered when convenient.

Regardless of the method, the team must be trained in the following areas at a minimum:

•an understanding of the risk management framework in ANSI/ASSE Z690-2011 (ANSI/ASSE, 2011b);

•understanding of definitions for critical terms such as *hazard, risk, probability/likelihood, severity/consequences*;

•risk assessment tools that the team will use to conduct the assessment (e.g., matrix, cause/effect diagram);

•hierarchy of controls with emphasis on how higher-level controls provide better management of risk, especially for those risks with consequences that include serious injury or fatality;

•application of risk treatment once the assessment is complete.

In larger organizations, nearly everyone is involved in a risk assessment team at some stage of the process. Key team members may be involved in most assessments, but nearly every frontline supervisor and production employee must provide input. Due to SMEs' size and the likelihood of a smaller number of risks to assess, putting together and training one or two core risk assessment teams may be a more effective strategy than trying to engage most employees, at least at first. Consider including the following employees on this core team:

•one or two risk champions;

•a lead member of the maintenance department;

•a frontline operations supervisor, preferably one who oversees the area most likely to undergo a risk assessment first;

•a member of the organization's safety committee, if one exists.

When initiating the risk assessment process, start where you are welcome. This is true regard-

less of an organization's size, but is even more important in an SME. Finding the right department or process area that welcomes the concepts of risk management and welcomes the team's efforts will pay off not only in the success of the first or second assessment, but because word spreads faster in smaller organizations. Getting good buzz from the start can pave the way for future efforts.

In addition to finding the most welcoming place to start the process, consider addressing areas with immediate and highly visible risk reduction, thereby providing tangible results that can be shared with staff and senior management. Once those two groups are on board with the initial successes, they will provide the best means of conveying the effort's success throughout the organization. SMEs have an advantage here; their size helps good news travel fast. This also increases the importance of the initial assessment success, because bad news travels just as fast.

As a means of identifying potential starting points, the OSH professional should review incident data and near-hit reports to identify where the most serious incidents have or may have occurred. Documents that provide these data include loss histories, which can be obtained from insurance brokers or carriers, historical OSHA logs and audits/inspections.

If the company's incident history or a formal inspection process is limited or nonexistent, identifying precursors that demonstrate an increased likelihood of a potential serious injury or fatality

may narrow the target. Review of large incident data sets has identified these common incident precursors for serious injuries and fatalities:

- use of mobile equipment, particularly in areas with pedestrian interaction;
- confined space entry;
- tasks that require the control of hazardous energy through lockout/tagout;
- tasks that require lifting of products, equipment or machinery;
- tasks that require working at heights;
- tasks that require manual materials handling;
- process instability or significant process upsets;
- unexpected maintenance;
- situations that require the use of emergency shutdown procedures (ISHN, 2012).

Choose Risk Assessment Tools Wisely

ANSI/ASSE Z690.3 (ANSI/ASSE, 2011a) provides detailed information on more than 30 risk assessment tools. Most of these tools are not necessary when starting a risk assessment process, or even desirable for an SME whose risk management implementation is not yet mature, for an OSH professional just beginning to lead a risk assessment team or for a team that is relatively new to the process. Plenty of easy-to-implement tools are outlined in the standard that can effectively assess most processes in a typical SME (see "Risk Assessment Tools" sidebar, p. 66).

Once the SME is more fully engaged in risk management, it may consider adding new and potentially more complex tools, although many SMEs and some larger organizations may never need to do so.

Learn the SME's Top 5 Risks & Develop an Elevator Pitch

Once the risk management process is underway, its success will be based not only on the OSH professional's well-versed understanding of risk management and the SME's reason for undertaking the process, but also on the OSH professional's ability to communicate it clearly, succinctly and frequently. This can be accomplished by engaging in ongoing dialogue with senior management about the progress and the path forward. It will involve periodic written reports as well as formal meetings that provide updates. OSH professionals should establish both parameters in advance and ensure that they are included in the written risk management policy.

More importantly, the OSH professional must take the lead as the most visible and vocal risk champion in the organization. This requires readily and easily speaking to the process and the beneficial aspects of its implementation in various platforms and with a range of employee levels.

The term *elevator pitch* often refers to the ability to quickly and succinctly describe something to an audience with a limited time frame. Elevator pitches are typically used by entrepreneurs and business owners to tout their company to potential investors or buyers, and must cover key points quickly. However, the concept is applicable to an

OSH professional working to lead a major shift in an organization (see "Creating a Successful Elevator Pitch" sidebar). The skill is not easily mastered without preparation and practice. OSH professionals must work to polish their risk assessment elevator pitch technique by having several ready scripts that can be modified to the setting (e.g., a literal elevator ride with the CEO, a walk on the production floor with a skeptical frontline supervisor).

A corollary to the elevator pitch, the OSH professional must be able to quickly and effectively describe his/her organization's top five risks (ASSE, 2016b). The overarching goal of any risk management process is to manage the worst risks first by identifying them, assessing them, developing mitigation plans to address them and monitoring the success of the mitigation process. The OSH professional must be able to readily describe these risks and articulate the current work being done to address them.

As discussed, the OSH professional in an SME must be an expert on risk and a leader of the process. As this reputation grows throughout the organization, more colleagues will look to the OSH professional for guidance and the ability to continually elevate the process.

Conclusion

Risk management has moved from being considered best practice to expected procedure in larger organizations, particularly those with a global footprint and where risk management has been widely used for many years. OSH professionals in those organizations are typically skilled at the process, including creating and leading risk assessment teams, and knowing how to implement many risk assessment tools. These professionals can use the risk management process to drive continuous improvement and a reduction in incidents, particularly those with severe outcomes. If these OSH professionals did not possess the skill prior to joining the organization, they learned the skills on the job.

OSH professionals in some SMEs may aspire to replicate this process in their organizations, but do not because of perceived intensity of the process and need for extensive resources that are not available. They may also believe they lack the skills to lead the effort. The result is the SME's exposure to higher risk levels that may be unnecessary if the risk management framework can be rightsized. By following a process of becoming an expert on OSH risk, completing a gap analysis, engaging management, finding risk champions and starting where the risk assessment team is wanted, the OSH professional can develop a baseline that will allow for a deeper, more developed system. **PS**

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