INSIDER REPORT

Safety Culture as a Driver of Compliance and Performance

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SAFETY CULTURE AS A DRIVER OF COMPLIANCE AND PERFORMANCE

The future of workplace safety is here. Today, employers must go beyond simply enforcing rules and procedures and help their workforce embrace safety as a priority in their day-to-day operations. Establishing a culture of safety is the most effective way to accomplish this—a process that includes motivating positive employee behavior, creating strong advocates for safety initiatives, and securing buy-in from superiors, who must understand the financial implications of safety performance.

Independent research shows that improving safety culture decreases incidents in any process, thereby decreasing injury rates and severity, improving morale, increasing productivity, lowering costs, and reducing potential fines and penalties. There is a clear business case for building a strong safety culture, but it will take a careful strategy and deliberate execution to be truly effective.

It starts with you.

This special report will outline the best strategies for implementing and improving safety training, incentives and discipline, and safety leadership to improve safety culture. It will provide the baseline knowledge you need to limit your liability, comply with federal regulations, and drive safety success in your organization for your entire workforce.

SAFETY CULTURE CHECKLIST: 6 KEYS TO SUCCESS

Many organizations want to improve their safety culture in order to reduce injury rates, save money, and increase productivity. But how does a company begin to foster a culture of safety? The following are a just few key areas that go a long way toward establishing a positive safety culture in an organization:

1. **Management commitment.** A safety culture must have the full commitment of company leadership. Executives and managers must lead by example by following safety policies themselves and must adopt safety as a core organizational value. Safety efforts must be viewed as complementary to productivity and profitability goals rather than in conflict with them.

2. **Employee engagement.** In an organization with a strong safety culture, employees are highly engaged with safety. They don't resent safety efforts, view safety rules as a nuisance that interferes with their work, or believe that safety is "someone else's job." Rather, they are fully committed to making their workplace as safe as possible. Engaged employees do not hesitate to speak up if they witness unsafe conditions or actions because they know they can raise concerns without fear of retaliation.

3. **Job hazard analysis and incident investigation.** In order to protect employees from workplace hazards, you need to know what these hazards are. Completing job hazard analyses allows you to identify the hazards associated with the tasks your workers perform and discern appropriate protective measures. Similarly, following an incident, you need to be able to drill down to the root cause to determine what went wrong and how to implement corrective actions to prevent recurrences. An effective incident investigation program will allow you to do this.

4. **Policies and procedures.** Policies and procedures are the backbones that support a safety culture. Safety-related policies—for example, policies regarding the use of personal protective equipment (PPE) or prohibiting horseplay—should be clear, be in writing, and specify consequences for noncompliance. Procedures, such as those for lockout/tagout or emergency shutdown, should be written in easily understandable language that describes the subject in a step-by-step manner. Employees must be familiar with the safety policies and procedures they are expected to follow and must be able to review them at any time.

5. **Training and competency.** To have a strong safety culture, employees need to receive high-quality training on the company's safety policies and procedures, hazards they may be exposed to on the job, and safe work practices for protecting themselves against these hazards. Training must be in a language and vocabulary that workers can understand, and it must be provided to all workers, including temporary workers. Make sure to document training and keep track of when refresher training is necessary.

6. **Measurable goals and accountability.** Safety culture cannot take hold in an organization without clearly defined goals and reliable metrics for assessing success. A combination of leading and lagging indicators provides the most complete picture of an organization's safety culture. Set challenging yet achievable safety goals, and evaluate your progress toward them frequently, making adjustments as necessary.

TIPS AND TACTICS FOR A STRONGER, MORE EFFECTIVE SAFETY COMMITTEE

Of course, you have a safety committee. But how effective is it? Does it satisfy a state requirement, with minimal creativity or innovation? Is it just your ticket to a discount on your workers' comp coverage? Or, does it truly enhance your safety performance, giving employees at all levels an opportunity to lead and engage in the safety process?

This Compliance Report delivers reminders, tips, and best practices for making your safety committee successful. Be sure to share the content with your committee and use it as a departure point for improvements at your site or company.

GIVING EVERYONE A VOICE

According to employment lawyer and safety professional Adele Abrams, a safety and health committee is "an organizational structure where members represent a group, giving everyone a voice." Committees aid and advise management and employees about safety and health pertaining to a plant or company operation. An effective safety committee encourages safety awareness, has a large number of employees actively involved in the safety program, and motivates employees to follow sound safety practices.

An effective employee safety structure provides a feedback mechanism to identify and correct new safety hazards at the earliest stage. Once the safety committee structure is in place and working well, it is a natural vehicle for employee involvement, preparation, and introduction of new safety efforts.

There are no federal requirements for safety committees in private sector workplaces. However, many states require them. In other states, employers may get a discount on their workers' compensation premiums if they have a safety committee in place. Tasks can include monitoring, training, conducting investigations, and developing innovative solutions to safety issues.

Committee membership and makeup vary greatly by size, structure, purpose, hazards, and the makeup of employees and managers. At some sites, committee membership is strictly voluntary, while at other workplaces, management may recommend or volunteer employees for participation. However, it is important to emphasize that a committee meeting is not a safety meeting during which all employees or managers are present; rather, representatives are limited in number.

DIVERSE BENEFITS

Safety committees can help achieve a variety of objectives, not all of which are directly related to worker protection. Among them:

- **Big picture.** Committees that represent all functions or departments allow the organization to take an overall look at safety requirements and foresee problems that might otherwise cause difficulties.

- **Sounding board.** The committee is a visible and approachable body for safety or health complaints, suggestions, etc.

- **Central coordination.** With management direction, much of the coordination of safety activities can be accomplished by the safety committee, which shares with management the responsibilities for implementing and monitoring the safety process.

WorkSafeMT, a nonprofit safety organization, describes a committee's purpose like this:

- To promote and maintain the interest of employees in health and safety issues;
- To educate managers, supervisors, and employees through awareness and training activities for which they have primary responsibility;
- To help make health and safety activities an integral part of the organization's operating procedures, cultures, and programs;
- To provide an opportunity for the free discussion of health and safety problems and solutions;
- To inform and educate employees and supervisors about health and safety issues, new standards, research, etc.;
- To help reduce the risk of workplace injuries and illnesses; and
- To help ensure compliance with federal and state health and safety standards.

MEASURING SUCCESS

Although there are many ways to measure the success of your committee (and your plan needs to spell these out), the following are basic levels of effectiveness:

- Meetings are consistently scheduled and held on a regular basis.
- Clear meeting agendas are created, published in advance, and followed.
- Minutes summarize the issues discussed, proposed action items, and the individuals responsible for follow-up on each item. Minutes are published and provided to each committee member and are made available to all employees.
- Members are required to attend all meetings, except in case of emergency. If a member cannot attend, an alternate is sent. Attendance is taken at each meeting and is recorded in the minutes. Some committees record and publish the names of members who did not attend, as well as those who did.
- The committee's accomplishments are publicized. Acknowledging success reinforces the effort of members and makes others want to be part of something positive.
- The efforts of individuals and groups throughout the organization that make significant contributions to the safety program are acknowledged.

DO THIS, NOT THAT

In order to make a real difference, a good safety committee must go well beyond the basics. Like any effective organization, your safety committee needs a mission statement—a clear expression of management's goals and expectations for the group. A mission statement also provides the committee with guidelines that help it meet requirements. According to WorkSafeMT's Best Practices for Workplace Safety Committees, top leaders should attend safety committee meetings at least periodically, which demonstrates their interest in the safety program to both supervisors and employees. The committee should address legitimate safety issues only. Keep meetings from devolving into gripe sessions that accomplish nothing and lead to discord.

As for pitfalls, workers' compensation carrier SFM points to 10 common safety committee mistakes:

1. Roles are not clearly defined.
2. The committee is too big or too small.
3. New members are not adequately trained.
4. There is no formal meeting agenda.
5. There's a lack of follow-up on action items.
6. There's inadequate communication.
7. Management dominates the committee.
8. There's a lack of employee participation.
9. There's an inability to adapt to change.
10. There's an insufficient budget.

https://oem.msu.edu/images/abrasive_blasting/2018_Appendices/VIII-A_Best_Practices_For_Workplace_Safety_Committees.pdf

https://app.sfmic.com/col/resourceCatalog/doc/comptalk_safety_committees.pdf?origin=N&tickCount=638137215508905330

CHECKING THE BOXES OR MOVING THE NEEDLE?

The Minnesota Occupational Safety and Health Administration (OSHA) has developed a self-evaluation checklist to identify areas of improvement for safety and health committees. We have provided an edited version of that document to help you assess your efforts:

☑ Are safety committee leaders elected by the committee?

☑ Are terms of service staggered so that at least one experienced member from labor and management is serving on the committee?

☑ Are efforts made to ensure that committee members represent the major work activities/departments of the site?

☑ Does the committee schedule regular meetings?

☑ Does the committee work from a written (and distributed) agenda?

☑ Are minutes maintained and made available to all employees?

☑ Are all reports, evaluations, and recommendations made part of the minutes?

☑ Does the committee have a system for collecting safety-related suggestions, hazard reports, or other information from frontline workers?

☑ Does the committee help the employer evaluate the employer's accident and illness prevention program?

☑ Does the committee make written recommendations to improve safety and health?

☑ Are there established procedures that allow the safety committee inspection team to identify safety and health hazards?

☑ Does the committee recommend ways for the employer to eliminate or correct hazards and unsafe work practices?

☑ Does the inspection team include employer and employee representatives?

☑ Does the committee inspection team document in writing the location of hazards and identify them?

☑ Are inspections of satellite locations done by the safety committee inspection team or by an individual designated at the location?

☑ Are there procedures to review safety and health inspection reports made by the committee? Based on the results of the review, does the committee make recommendations for occupational safety and health (OSH) improvements?

☑ Has the committee established procedures for investigating injuries, illnesses, fatalities, and near misses?

☑ Have the committee's purpose, operation, and rules been discussed with all members?

☑ Have committee members received appropriate training tailored to the site's operations and processes for hazard identification and accident investigation?

☑ Does management respond in a timely manner to recommendations? Is there a time frame established for responding to safety committee suggestions?

https://mn.gov/admin/assets/Employers%20Guide%20 to%2Developing%20a%20Labor%20-Management%20Safety%20 Committee_tcm36-393871.pdf

IMPROVING SAFETY LEADERSHIP

Because health and safety tend to operate alongside the hierarchical management structure of an organization, safety professionals may not think of themselves as leaders. But that does not mean that safety professionals can't implement the same leadership practices that company managers use to increase their effectiveness in the workplace.

The concept of safety leadership is much more developed abroad in Europe and Australia than it is in the United States. Let's take a look at some information you can put to immediate use.

BE A LEADER

Fortunately for health and safety professionals who are not managers in a strict sense—that is, having direct authority over a group of people directly involved in production or services—management and leadership are not the same thing. What is the difference between a manager and a leader?

Essentially, according to the Leadership and Worker Engagement Forum of Great Britain's Health and Safety Executive (HSE), the difference is one of vision versus execution:

Leaders are capable of creating a vision, communicating their vision to others, and encouraging others to commit to their vision. That commitment gives rise to motivation, innovation, and adaptation that can help bring the vision about.

Managers have a much more pragmatic function. Managers are responsible for planning, scheduling, resource allocation, and progress evaluation.

Although it is possible for one individual to do both jobs, it's important to understand the difference between the two.

https://www.hseblog.com/the-difference-between-leadership-and-management/

THE EFFECT OF GOOD LEADERSHIP

Skillful health and safety leadership has multiple benefits for an organization. The measurable impact of good leadership on your organization includes:

- **Building workers' safety knowledge.** Before workers can know it, you have to know it. If you are not up to date on the latest developments in your field, if you can't make the case that safe workers are more productive workers, or if you don't know how to properly analyze the hazards of the job, how are you going to pass that information along to them?
- **Strengthening workers' motivation.** If you don't care, why would they? Let your passion for safety and health—specifically, for your workers' safety and health—be an example for your employees. One of the things a leader does well is motivate others.
- **Increasing compliance with safety rules.** Workers who know more, and who are more motivated, will be better about complying with safety rules, so when you have laid the leadership groundwork, it organically gives rise to the outcome you are looking for.
- **Encouraging proactive safety behaviors.** Have you had a tough time in the past getting workers involved in proactive efforts like safety committee participation? Use positive reinforcement when workers go above and beyond. Sometimes just a quick recognition in front of others is enough to keep their spirits up. Strong leadership that enhances workers' knowledge and strengthens workers' motivation will have a positive effect on these efforts, as well.

5 COMMON SAFETY STRATEGY PROBLEMS

Shawn Galloway, president and chief operating officer of ProAct Safety, offers five common problems organizations need to overcome to improve both their safety planning and their execution.

1. **Using mostly buzzwords.** In many companies, there are phrases like "zero injuries," "employee engagement," "world-class safety performance," and "top tier" that appear to be empty, without meaning, and without a clear plan or road map to get there.

2. **Having a programmatic approach.** Rather than thinking through needs, process, and measurement, many organizations jump right into solutions, programs, and training. This results in safety efforts' often being awkward fits for both the company and other business activities.

3. **Ignoring culture.** Efforts primarily focus on incident prevention without considering the gap between the desired and current culture. We know culture is why compliance and excellence efforts succeed or fail. Culture is the ultimate sustainability mechanism of a corporation.

4. **Focusing primarily on failing less.** Even if initiatives are well designed to achieve the desired improvement, they are not always carried out effectively and often lack process metrics to measure the effectiveness of the effort.

5. **Competing with the business strategy rather than ensuring fit and value-add.** Safety will never become a core value within a company culture until the safety strategy is aligned with and supports the business strategy rather than hindering or constricting it.

https://ehsdailyadvisor.blr.com/2017/02/5-common-safety-strategy-problems/

DELIVERING EFFECTIVE SAFETY TRAINING

Training is an important part of workplace safety programs. OSHA has more than 100 standards that contain training requirements. In OSHA's Resource for Development and Delivery of Training to Workers, the agency provides guidance on how to develop and deliver effective training to workers.

There are several factors that contribute to successful training, including ensuring the training facilitator has expertise in safety and health, sound instructional skills, and flexibility, according to OSHA. Effective training should enable participants to learn how to:

- Identify safety and health problems in their workplace.
- Analyze the causes of the safety and health problems.
- Bring about safer, healthier workplaces.
- Involve coworkers in accomplishing the above.

CHARACTERISTICS OF SOUND TRAINING PROGRAMS

The best training programs have the following characteristics in common, according to OSHA. They should be:

- **Accurate.** Training materials should be prepared by qualified individuals, updated as needed, and facilitated by appropriately qualified and experienced individuals employing appropriate training techniques and methods.
- **Credible.** Training facilitators should have a general safety and health background or be subject matter experts in a health- or safety-related field. They should also have experience training adults or experience working with the target population. Practical experience in the field of safety and health, as well as experience in training facilitation, contributes to a higher degree of facilitator credibility.
- **Clear.** Training programs must be not only accurate and believable but also clear and understandable to the participant. If the material is only understandable to someone with a college education or someone who understands the jargon, then the program will fall short of meeting workers' needs. Training materials should be written in the language and grammar of the everyday speech of the participants. Training developers should ensure that readability and language choices match the intended audience. For employees who do not speak or understand English, instruction must be provided in a language that the employees can understand. Similarly, if employees' vocabulary is limited or there is evidence of low literacy among participants, the training must account for this limitation.
- **Practical.** Training programs should present information, ideas, and skills that participants see as directly useful in their working lives. Successful transfer of learning occurs when participants can see how information presented in a training session can be applied in the workplace.

BEST PRACTICES

To maximize the benefits of the training for participants, trainers need to focus on the following best practices, according to OSHA:

1. **Remember your intended audience.** The training should be intended for employers, safety officers, or any organization that provides occupational safety and health training.

2. **Training techniques, methods, and modes:**
   - Proven adult learning techniques should be at the core of training development and delivery.
   - One effective worker training model is peer-to-peer training with activity-based learning. The organization should provide ongoing support to developing peer trainers.
   - Use activity-based learning for at least two-thirds of training hours, meaning no more than one-third is lectures.
   - Training must be provided in a language and vocabulary that workers can understand.
   - Computer-based training is effective but should not be the only form of training workers receive.

3. **Needs assessment.** Precede safety and health training with a needs assessment to ensure the training meets the needs of participants. These assessments can also tell you more about participants' knowledge, experience, learning styles, reading and writing skills, and interests.

4. **Evaluate training.** Evaluate your training to assess whether it is having the desired results. An evaluation can indicate whether you need to make changes to the program.

PRINCIPLES OF ADULT EDUCATION

OSHA cites the following basic principles of adult education to help trainers provide effective training:

- Most adults learn because they want to and have decided they need to learn for a particular reason.
- Adults need to see that the subject matter and methods are relevant to their lives and what they want to learn.
- Adults should be encouraged to share their experiences and knowledge.
- Adult learners resent an instructor who talks down to them and ignores their ideas and concerns.

- Adults need to be involved and actively participating in class.
- Adults retain more information when they use and practice their knowledge and skills in class.
- Learners need "route maps" with clear objectives. Each new piece of information needs to build logically on the previous one.
- Adults learn best when new information is reinforced and repeated.
- Adults learn better when an instructor uses a variety of teaching techniques.

SAFETY TRAINING, SAFETY CULTURE

Safety training can help reinforce a strong safety culture at your facility or jobsites, and basic safety training like the OSHA 10-hour course may be helpful in fostering employee safety awareness and compliance. Research has shown that training affects worker safety and health behavior, especially behavior surrounding ergonomic hazards.

Signs of a troubled safety culture can include failure to comply with your safety rules, policies, and procedures and risky worker behavior.

Employees' "bending" or breaking workplace safety rules and procedures can have serious consequences, even the loss of a limb. For example, in a lockout/tagout case at a Walmart distribution center heard by the Occupational Safety and Health Review Commission, it was revealed that company and contract employees were regularly circumventing company procedures for entering an electrified monorail system (EMS), which consisted of trolleys to move pallets of merchandise within the warehouse.

Employees of Walmart and its logistic contractor crossed over fixed conveyors to enter the EMS. Employees also placed pieces of cardboard over the light curtains between loops of the EMS. Tragically, an employee servicing merchandise trolleys was struck by one, and a piece of machinery penetrated his leg.

The Walmart case points to the possibility of a "hidden" safety culture that can be starkly different from your stated policies, procedures, and employee rules. But, training may correct workers' misconceptions about the safety culture and shore up compliance with safety policies, procedures, and rules.

You need to persist until you get to underlying safety issues, looking for hidden "mixed" messages and training accordingly. Look for common threads in your incident investigation reports, and hunt down employees' jerry-built solutions that pose a safety hazard.

Safety training is a key component of an overall safety and health management system, according to the American Society of Safety Professionals (ASSP). While training remains a key element of an effective safety and health management program, training alone is not enough to prevent workplace injuries and illnesses. Other elements of an effective safety and health management program include safety observations, safety audits, job hazard analyses, and incident (or "near miss") investigations.

https://ehsdailyadvisor.blr.com/2022/06/back-to-basics-delivering-effective-safety-training/
https://ehsdailyadvisor.blr.com/2023/01/take-a-closer-look-at-your-safety-training-program/

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