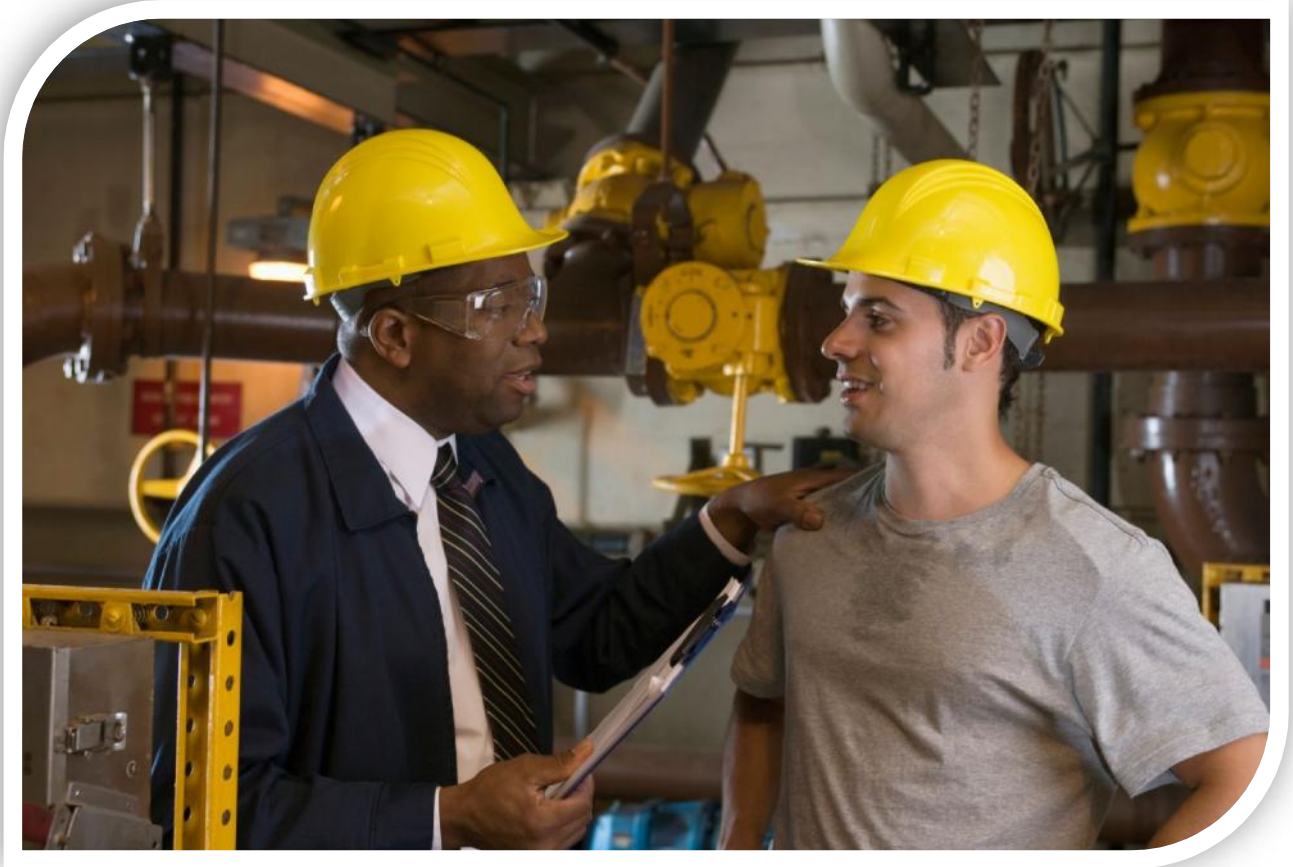


# Safety Supervision and Leadership



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# OSHAcademy Course 712 Study Guide

## Safety Supervision and Leadership

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Contact OSHAcademy to arrange for use as a training document.

This study guide is designed to be reviewed off-line as a tool for preparation to successfully complete OSHAcademy Course 712.

We hope you enjoy the course and if you have any questions, feel free to email or call:

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## Course Introduction

### Supervisors Are the Key

The supervisor is the one person who can take immediate, direct action to make sure that his or her work area is safe and healthful for all employees. Russell DeReamer, author of *Modern Safety Practices*, considers the supervisor the only person who can control employees, machines, and working conditions on a daily, full-time basis.

In his text, *Occupational Safety and Health Management*, Thomas Anton relates that the supervisor bears the greatest responsibility and accountability for implementing the safety and health program because it is he or she who works most directly with the employee. It is important that the supervisor understands and applies successful management and leadership principles to safety and health to make sure employees enjoy an injury- and illness-free work environment.

This course introduces you to key elements that help the supervisor demonstrate "5-STARS" supervision and leadership within the safety and health function. The key 5-STARS of safety supervision and leadership are:

**S**upervision - overseeing work activities to make sure employees are safe.

**T**rainning - conducting safety education and training.

**A**ccountability - insisting everyone complies with company safety policies and rules.

**R**esources - providing physical resources (tools, equipment, materials, etc.) so employees can work safely.

**S**upport - creating a supportive, psychosocial work environment (schedules, workloads, recognition, etc.) so employees do not work under undue stress.

Supervisors can demonstrate leadership by directly providing employees the resources, motivation, priorities, and accountability for ensuring their safety and health. Enlightened supervisors understand the value in creating and fostering a strong safety culture within their department. Safety is elevated so that it is a value as opposed to something that must be done or accomplished. Integrating safety and health concerns into the everyday supervision allows for a proactive approach to accident prevention and demonstrates the importance of working safely.

## Module 1: Overview of Employer Responsibilities

### Introduction

As an "agent of the employer" the supervisor assumes the responsibilities of the employer to the degree he or she has been given authority. This first module will introduce you to some of the basic employer responsibilities to OSHA law, and the obligations the employer and employees have to each other. Fulfilling these obligations is a function of competent management and leadership: the theme throughout the entire course.

### Safety is Smart Business!

Although we're discussing what the legal obligations the employer has in this module, it's important not to lose sight of the fact that "doing safety" to primarily avoid OSHA violations and penalties is probably the least effective safety management approach. Employers who understand the long term financial and cultural benefits derived from world-class safety management and leadership will be more likely to develop a proactive safety and health system that not only meets OSHA requirements, but far exceeds them. You can find out more about developing effective safety systems in Course 700.

### The Importance of the Supervisor

The supervisor is the person who can take immediate, direct action to make sure that his or her work area is safe and healthful for all employees. In his text, [Occupational Safety and Health Management](#), Thomas Anton relates that the supervisor bears the greatest responsibility and accountability for implementing the safety and health program because it is he or she who works most directly with the employee.

It is important that the supervisor understands and applies successful management and leadership principles to make sure their employees enjoy an injury- and illness-free work environment. Management may be thought of as applying organizational skills, while leadership involves effective human relations skills.

### What the Law Says

As detailed in the Section 5 (The General Duty Clause) of the OSHA Act of 1970, the employer is assigned responsibility and held accountable to maintain a safe and healthful workplace.

*Excerpt: Public Law 91-596, 91st Congress, S. 2193, December 29, 1970:*

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### *An Act*

To assure safe and healthful working conditions for working men and women; by authorizing enforcement of the standards developed under the Act; by assisting and encouraging the States in their efforts to assure safe and healthful working conditions; by providing for research, information, education and training in the field of occupational safety and health; and for other purposes.

Be it enacted by the Senate and House of Representatives of the United States of America in Congress assembled, That this Act may be cited as the 'Occupational Safety and Health Act of 1970'.

### Section 5

(a) Each Employer -

(1) shall furnish to each of his employees employment and a place of employment which are free from recognized hazards that are causing or are likely to cause death or serious physical harm to his employees;

(2) shall comply with occupational safety and health standards promulgated under this act.

(b) Each employer shall comply with occupational safety and health standards and all rules, regulations, and orders issued pursuant to this Act which are applicable to his own actions and conduct.

---

## **Employer Responsibilities**

As you can see, employers have clearly defined responsibilities under the Occupational Safety and Health Act of 1970. The following list is an expansion on those basic responsibilities that are stated throughout the OSHA standards.

- J Provide a workplace free from recognized hazards. A recognized hazard may be thought to be one that is known by—or should be known by—the employer, such as conditions and practices generally known to be hazardous in an industry. Ultimately, fulfilling this

requirement is a function of sound management and leadership. We'll be addressing effective management throughout the course, and leadership more specifically in Module 8.

- J Examine workplace conditions to make sure they conform to applicable OSHA standards. Workplace conditions can be thought of as things or states of being. Hazardous conditions include tools, equipment, workstations, materials, facilities, environments, and people. Employees who, for any reason, are not capable of working safely should be considered hazardous conditions in the workplace. Identifying hazards will be covered in Module 2.
- J Minimize or reduce hazards. OSHA expects the employer to first consider engineering controls to eliminate or reduce hazards. Work practice, administrative controls, and personal protective equipment are also strategies used to minimize or reduce hazards. We'll be addressing this important responsibility in Module 3.
- J Make sure employees have and use safe tools and equipment and properly maintain this equipment. How does the employer "make sure" this responsibility is fulfilled? Adequate supervision means identifying and correcting hazardous conditions and unsafe work practices before they result in injuries. Successfully meeting this responsibility will be covered in Module 4.
- J Use color codes, posters, labels, or signs to warn employees of potential hazards. Remember, warnings do not prevent exposure to hazards. Make sure warnings describe the consequences of exposure or behavior.
- J Establish or update operating procedures. Is OSHA talking about a comprehensive safety program? Although it is not yet required by OSHA standards, it's smart business to develop a comprehensive written plan that addresses commitment, involvement, identification, control, analysis, and evaluation activities. Typically, first-line supervisors are not involved in developing comprehensive safety plans unless they are members of a safety committee.
- J Communicate safety policies, procedures, and rules. This requirement is necessary so that employees follow safety and health requirements. The supervisor is a key player in communicating safety expectations. Although the safety committee and safety

coordinator may provide help in fulfilling this responsibility, do not assume it's solely their job. Effective safety communications will be addressed in Module 4.

- J Provide medical examinations and training when required by OSHA standards. Respiratory protection, bloodborne pathogens, and other rules may require examinations.
- J Provide adequate safety education and training. Of course, any exposure to hazards requires training. Safety education at all levels of the organization is critical to a successful safety culture. More on this topic in Module 5.
- J Report fatalities and catastrophes to the nearest OSHA office within 8 hours. This requirement includes any fatal accident or one that results in the hospitalization of three or more employees. If you work in a "state plan" state, your OSHA laws may include additional reporting requirements.
- J Keep records of work-related injuries and illnesses. Provide employees, former employees, and their representatives access to the OSHA Form 300 at a reasonable time and in a reasonable manner. Post the OSHA Form 300-A summary in an area that is accessible to employees no later than February 1 of the year following the year covered by the records and keep the posting in place until April 30 of that same year.
- J Provide access to employee medical records and exposure records. Access should be provided to affected employees or their authorized representatives.
- J Not discriminate against employees who exercise their rights under the Act. Employees have a legal right to communicate with OSHA. No employee should be subject to restraint, interference, coercion, discrimination, or reprisal for filing a report of an unsafe or unhealthful working condition. More on this later in the module.
- J Post OSHA citations at or near the work area involved. Each citation must remain posted until the violation has been corrected, or for three working days, whichever is longer. Post abatement verification documents or tags. Correct cited violations by the deadline set by OSHA citation and submit required abatement verification documentation.

Of course, these are not all of the employer responsibilities, but this summary does present those general responsibilities each employer has to both the law and their employees. The list

above reflects the fact that the employer has control of work and workplace conditions. Tied to that control is accountability. On the other hand, what general responsibilities do employees have to their employer?

### Employee Responsibilities

Although OSHA does not cite employees for violations of their responsibilities, each employee must comply with all occupational safety and health standards and all rules, regulations, and orders issued under the Act that are applicable. Employee compliance is not likely unless the employer holds its employees accountable. Think of it this way: the employer is held accountable to OSHA standards, while the employee is held accountable to the employer standards.

One effective strategy for communicating this "chain of command" for accountability is for the employer to use language stressing that employees comply with the "company's safety rules" rather than the OSHA rules. Instead of having an "OSHA Manual," construct an "XYZ, Inc. Safety Manual."

Following this strategy to communicate responsibilities is important for a couple of reasons:

- J The employer communicates the message that they are doing safety because they want to out of concern for their safety, not because they have to in order to comply with the law.
- J Employees at all levels should clearly understand the "chain of command" for accountability in the workplace.

According to OSHA law, employees should do the following:

- J Follow all lawful OSHA and employer safety policies and rules.
- J Report hazardous conditions to the supervisor.
- J Immediately report any job-related injury or illness to the employer.
- J Seek proper treatment if injury or illness occurs.

## Discrimination against Employees Who Exercise Their Safety and Health Rights

Workers have the right to complain to OSHA and seek an OSHA inspection. [Section 11\(c\)](#) of the Occupational Safety and Health Act of 1970 allows OSHA to investigate employee complaints of employer discrimination against those who are involved in safety and health activities. OSHA is also responsible for enforcing whistleblower protection under ten other laws. OSHA Area Office staff can explain the protections under these laws and the deadlines for filing complaints.

Workers in the 23 states operating OSHA-approved [State Plans](#) may file complaints of employer discrimination with the state plan as well. State and local government workers in these states (and two others with public employee only state plans) may file complaints of employer discrimination with the state.

Some examples of discrimination are firing, demotion, transfer, layoff, losing opportunity for overtime or promotion, exclusion from normal overtime work, assignment to an undesirable shift, denial of benefits such as sick leave or vacation time, blacklisting with other employers, taking away company housing, damaging credit at banks or credit unions and reducing pay or hours.

Refusing to do a job because of potentially unsafe workplace conditions is not ordinarily an employee right under the OSHA Act. (Your union contract or state law may, however, give you this right, but OSHA cannot enforce it.) Refusing to work may result in disciplinary action by your employer. However, employees have the right to refuse to do a job if they believe in good faith that they are exposed to an imminent danger. "Good faith" means that even if an imminent danger is not found to exist, the worker had reasonable grounds to believe that it did exist.

Most discrimination complaints fall under the OSHA Act of 1970 that gives the employee only 30 days to report acts of discrimination. OSHA conducts an in-depth interview with each complainant to determine the need for an investigation. If evidence supports the worker's claim of discrimination, OSHA will ask the employer to restore the worker's job, earnings and benefits. If the employer objects, OSHA may take the employer to court to seek relief for the worker.

## Module 1 Quiz

Use this quiz to self-check your understanding of the module content. You can also go online and take this quiz within the module. The online quiz provides the correct answer once submitted.

- 1. According to Thomas Anton, this position bears the greatest responsibility and accountability for implementing the safety and health program policies and procedures?**
  - a. Owner
  - b. Manager
  - c. Supervisor
  - d. Employee
  
- 2. What government "Act" assigns responsibility to maintain a safe and healthful workplace to the employer?**
  - a. The DOL Act of 1973
  - b. The BLS/OSHA Act
  - c. The OSHA Act of 1970
  - d. The EPA Act of 1982
  
- 3. The "Act" in question 2 states that the employer is to provide a workplace free from \_\_\_\_\_ that are causing or are likely to cause death or serious physical harm.**
  - a. hazardous conditions
  - b. unsafe behaviors
  - c. recognized hazards
  - d. unknown conditions



**4. Employees who, for any reason, are not capable of working safely should be considered \_\_\_\_\_.**

- a. hazardous conditions
- b. unsafe behaviors
- c. dangerous situations
- d. unknown conditions

**5. All the following are mandated employer responsibilities, except \_\_\_\_\_.**

- a. provide personal protective equipment
- b. conduct random drug tests
- c. conduct safety training
- d. enforce compliance with safety rules

## Module 2: Identifying Hazards

### Introduction

Since 1970, workplace fatalities have been reduced by half. Occupational injury and illness rates have been declining for the past six years, dropping in 1998 to the lowest level on record. But there is much more to do. Nearly 50 American workers are injured every minute of the 40-hour work week and almost 17 die each day. Federal and state OSHA programs have only about 2,500 inspectors to cover 100 million workers at six million worksites. Workers must play an active role in spotting workplace hazards and asking their employers to correct them.

In this module, we'll take a look at the five areas within which all workplace hazards exist. Additionally, we'll discuss the inspection and job hazard analysis processes that are two important proactive hazard identification processes. Finally, we'll examine the incident and accident investigation process and how it can effectively identify and help to eliminate hazards.

### The Five Workplace Hazard Categories

To help identify workplace hazards, it's useful to categorize them into easy-to-remember categories. The first three categories represent hazardous conditions. According to [SAIF Corporation](#), a major workers compensation insurer in Oregon, conditions directly account for only 3% of all workplace accidents. The fourth category describes employee behaviors in the workplace that may contribute or cause as much as 95% of all workplace accidents. All five categories represent the surface symptoms of underlying root causes or safety management system weaknesses. Take a look at the [accident weed](#) to get a better idea about the relationship between surface symptoms and root causes for accidents.

To remember the five hazard areas, don't forget the acronym **MEEPS**:

**M**aterials, **E**quipment, **E**nvironment, **P**eople, and **S**ystem.

Let's review these five categories.

*Materials*: liquids, solids and gases that can be hazardous to employees.

- ) Liquid and solid chemicals (such as acids, bases, solvents, explosives, etc.) can produce harmful effects.

- J Raw materials (solids like metal, wood, and plastic) used to manufacture products are usually bought in large quantities and can cause injuries or fatalities in many ways.
- J Gases, like hydrogen sulfide and methane, may be extremely hazardous if leaked into the atmosphere.

*Equipment:* machinery and tools used to produce or process goods.

- J Hazardous equipment that is improperly guarded and places workers in a danger zone around moving parts could cause injury or death.
- J Lack-of a preventive maintenance program will make it difficult to ensure equipment operates properly.
- J If there is no corrective maintenance program, then equipment that is broken or causing a safety hazard may not be fixed immediately and cause workers harm.
- J Tools that are not in good working order, improperly repaired, or not used for their intended purpose only is an accident waiting to happen. Any maintenance person will tell you that an accident can easily occur if tools are not used correctly. Tools that are used while broken are also very dangerous.

*Environment:* the general area that employees are working in.

- J Poor facility design, hazardous atmospheres, temperature and/or noise can cause stress.
- J If areas in your workplace are too hot, cold, dusty, dirty, messy or wet, then measures should be taken to minimize the adverse conditions.
- J Extreme noise that can damage hearing should not be present.
- J Workstations may be designed improperly (short people working at workstations designed for tall people), contributing to an unsafe environment.

*People:* employees, management and others in the workplace.

- J Unsafe employee behaviors include taking short cuts or not using personal protective equipment.
- J Employees who are working while fatigued, under of influences of drugs or alcohol, distracted for any reason, or in a hurry cause “walking and working hazards.”

*System:* the processes and rules put into place to manage safety, also known as the safety management system.

- J Management may unintentionally promote unsafe behaviors.
- J Ineffective policies, procedures, rules (written and unwritten), practices and plans (also known as “Administrative Controls”) that ignore safe behaviors or direct unsafe work practices ultimately represent the causes for about 98% of all workplace accidents.

### Supervisor Role

As a supervisor, you have some tools that will help you identify and correct hazards in the five MEEPS areas discussed above.

### The Walk-around Safety Inspection

One important activity to ensure a safe work area is to conduct an effective walk-around safety inspection. If your organization relies solely on the safety committee to identify workplace hazards, it's possible the process may be ineffective. The job of maintaining a safe and healthful work area is a primary OSHA-mandated employer responsibility, so, to be most effective, it makes sense that the safety inspection responsibility be delegated to the supervisor. Who is better positioned to effectively identify and correct workplace hazards than the supervisor? Remember, as an agent of the employer, the basic responsibility to inspect the work area may rest with the supervisor.

As you conduct the inspection, you should be looking at the hazards associated with the five MEEPS categories discussed earlier (materials, equipment, environment, people and systems). In some instances, using an inspection checklist may be a good idea to make sure a systematic procedure is used. The only downside that can surface from using a checklist regards the "tunnel vision" syndrome: hazards not addressed on the checklist may be overlooked.

## The Person Conducting the Inspections

Most companies conduct safety inspections in compliance with OSHA rule requirements. But, is that good enough? Safety inspections may be effective, but only if those conducting the inspection are properly educated and trained in hazard identification and control concepts and principles specific to your company. It takes more to keep the workplace safe from hazards in industries that see change on a daily basis.

Employees should inspect the materials, equipment, and tools they use, and their immediate workstation for hazardous conditions at the start of each workday. They should inspect equipment such as forklifts, trucks, and other vehicles before using them at the start of each shift. It's better to inspect closely and often and give the process enough time. One of the major weaknesses in the inspection process is that we just don't spend enough time in particular areas to detect all hazards. Again, we do the "rolling eyeball" as we walk through an area.

## How to Build an Effective Safety Inspection Checklist

*Step One:* Determine the work area to be inspected, and the type of work being accomplished.

*Step Two:* Talk with the safety director, workers' compensation insurer, or OSHA consultant to determine what safety rules apply to the work area. Obtain copies of the rules.

*Step Three:* Select the rules that you feel directly apply to your work area. Many rules may not have significant impact on the work area you are responsible for.

*Step Four:* Change each selected rule into a checklist question. Be sure to state the question as concisely as possible.

*Step Five:* Ask employees who work in the area for recommended checklist questions.

The result of following these procedures is a checklist that closely mirrors those hazards that OSHA will be inspecting. It might be a good idea to use an expert resource, such as those listed in Step Two, to evaluate the checklist you have developed.

## Make Everyone an Inspector

As a supervisor, you probably don't want to be the only person inspecting for safety in your work area. You can, of course, delegate that responsibility to your workers. But how do you get them to willingly inspect for safety every day? Simple, (that's right, it doesn't have to be

difficult) you set the example yourself by inspecting regularly, you insist that they inspect, and you recognize (thank) your workers for inspecting and reporting hazards.

### The Job Hazard Analysis (JHA)

Another effective activity to ensure a safe and healthful workplace is the Job Hazard Analysis (JHA). In the JHA process, you and your employee together analyze each step of a particular task and come up with ways to make it safer. The JHA goes far beyond the walk around inspection in its ability to eliminate or reduce most causes for accidents in the workplace.

### Why the JHA?

*The problem:* Unfortunately, the walk around inspection is usually just an assessment. It merely attempts to determine if a hazard is present or not. It's conducted by one or two persons who walk around looking high and low to uncover hazardous conditions (I call this the "rolling eyeball syndrome"). If properly trained, they may effectively uncover hazards. If properly trained they may know how to effectively question employees during the inspection (they ask questions other than "any safety complaints?"). I think the most serious weakness inherent in the safety inspection process is that very little time is devoted to analyzing any one particular work area.

*The fix:* The Job Hazard Analysis is not plagued with all these problems. It goes beyond mere assessment by truly analyzing the conditions and practices related to one specific task. When completing a JHA, you must:

1. Break the job task down into specific steps.
2. Analyze each step to uncover hazardous conditions and unsafe work practices.
3. Develop strategies to correct hazardous conditions and unsafe work practices.
4. Develop safe work practices for each step when hazards and practices can't be eliminated.
5. Develop safe and efficient work procedures for the entire job.

Take a look at a simple [JHA worksheet](#) that you can adapt for your workplace.

The chief advantage is that adequate time is given to analysis of both hazardous conditions and unsafe work practices. Consequently, it may be possible to eliminate or reduce *all* of the causes

for a potential accident. This advantage makes the JHA far more useful and beneficial in preventing accidents in the workplace. Although the occupational safety and health rules do not specifically require JHA's be accomplished on all hazardous tasks, we strongly recommend a formal JHA program conducted jointly by supervisors and employees. It makes good business sense.

### Investigating Incidents and Accidents

Both the safety inspection and the JHA can be quite effective proactive safety processes to identify hazardous conditions and unsafe behaviors in the workplace. Although incident/accident investigations are "reactive" processes because they occur after the fact (the near-miss or injury) they may still be quite effective by identifying hazards and preventing future injuries. Check out the video to the right to learn more about the "Action Steps" in the incident/accident investigation process.

**Make sure employees report near-misses.** It's a proven fact that investigating near-miss incidents is effective for a number of reasons.

**Investigating incidents is always less expensive than investigating accidents.** They have to be, because an injury or illness has not occurred. Even a minor incident is important to investigate because, what might be today's cut finger, could be tomorrow's amputated finger. It's that simple.

**Accident investigation - Safety triage** Accident investigations that occur after someone is injured remain very important to your company's safety and health management system if the primary purpose is to uncover root causes. If accident investigations occur only to place blame, they are basically a waste of time and will harm the safety management system in the long term.

### The Incident/Accident Investigation Process

Accident investigation is a seven-step process with the ultimate for conducting accident investigations.

6. **Secure the scene** - to make sure evidence is not moved or disappears.
7. **Document the scene** - to gather data about the scene.

8. **Conduct interviews** - to determine events that led up to and included the accident event.
9. **Develop the sequence of events** - to determine exactly what happened in the proper sequence.
10. **Conduct cause analysis** - to determine surface and root causes associated with each event.
11. **Determine the solutions** - to develop immediate corrective actions and long-term system fixes.
12. **Write the report** - that emphasizes events, causes, solutions, costs, and benefits.

### Get To The Root Causes

When conducting an incident/accident investigation, it critical to uncover the underlying root causes for the event. An incident or accident may be the result of many factors that have interacted in some dynamic way. When conducting an incident/accident investigation, be sure to include each of the following levels of analysis to make sure you uncover the root causes:

**Injury analysis - How did the injury occur?** At this level of analysis, we focus on trying to determine the direct cause of the injury that may or did occur. Examples of the direct causes of injury include:

- ) Strain due to lifting heavy objects
- ) Concussion from impact forces due to a fall
- ) Tissue damage from contact with by a toxic chemical
- ) Burns from exposure to flammable materials

**Surface Cause Analysis - Why did the accident occur?** Here you determine the unique hazardous conditions and unsafe behaviors that interact to produce the accident. Each of the hazardous conditions and unsafe behaviors uncovered are the surface causes for the accident. They give clues that point to possible root causes/system weaknesses. Examples of surface causes include:

- ) a broken ladder



- ) a worker removes a machine guard
- ) a supervisor fails to conduct a safety inspection
- ) a defective tool

**Root cause analysis - Why did the surface causes occur?** At this level, you're analyzing the weaknesses in the safety management system that contributed to the accident such as missing or inadequate safety policies, programs, plans, processes, or procedures. This level of investigation is also called "common cause" analysis (in quality terms) because you're identifying a system component that may contribute to common conditions and behaviors that exist or occur throughout the company. Examples of root causes include:

- ) lack of a safety training program
- ) inadequate or missing safety procedures
- ) lack of enforcement of safety violations
- ) failure to conduct safety inspections

## Scenario

---

Trent, a new employee in the maintenance department, was told to remove a jammed conveyor belt. At the conveyor belt, he discovered that a wad of plastic had become tangled in a belt. As soon as he removed the plastic, the conveyor started up. Unfortunately, Trent's hand got caught in an incoming nip point and was severely injured.

---

It might be relatively easy to determine what the surface causes for the accident in this scenario are, but what might be the most likely root cause(s)? Root causes are the missing or inadequate programs, policies, plans, processes or procedures that produced the hazardous conditions and unsafe behaviors described in the scenario above.

Identifying hazards in your area of responsibility before they injure someone defines "adequate" supervision and sends a message of commitment and tough-caring leadership to your employees. I'm sure you'll realize many long-term benefits as a result of effective hazard identification.

## Module 2 Quiz

Use this quiz to self-check your understanding of the module content. You can also go online and take this quiz within the module. The online quiz provides the correct answer once submitted.

- 1. According to the Bureau of Labor Statistics, how many fatalities occur in the workplace each day?**
  - a. 25
  - b. 17
  - c. 3
  - d. 32
  
- 2. List the five general hazard categories.**
  - a. Materials, equipment, people, behaviors, procedures
  - b. People, conditions, practices, performance, environment
  - c. Materials, equipment, environment, people, system
  - d. People, materials, behaviors, management, situations
  
- 3. The inspection program is more likely to be ineffective if\_\_\_\_\_.**
  - a. inspections teams are composed of employees and managers
  - b. inspections are conducted only by safety committees
  - c. inspections include employee interviews
  - d. inspection frequency is proportionate to the degree of risk
  
- 4. The most serious weakness inherent in the inspection process may be that\_\_\_\_\_.**
  - a. inspections do not include employee interviews
  - b. inspections are not proportionate to the degree of risk
  - c. inspections are not conducted often enough
  - d. little time is given to analyzing a particular work area

**5. The accident investigation may be considered reactive\_\_\_\_\_.**

- a. if its purpose is to fix the blame
- b. because the process occurs after an injury occurs
- c. if it fails to fix system weaknesses
- d. if any of the above exist or occur

## Module 3: Correcting Hazards

### Introduction

In the last module, we examined the inspection and JHA processes to identify hazardous conditions and unsafe behaviors in the workplace. Once hazards have been identified, it's important that they be corrected immediately or as soon as possible.

Once hazardous conditions or unsafe behaviors are identified, it's important that the supervisor makes sure they are eliminated or reduced as soon as possible. To do this, one or a combination of the control strategies within the "Hierarchy of Controls" should be used.

In this module, we'll take a look at the Hierarchy of Controls and how they can effectively correct identified hazards. For more information on improving the safety management system, see Courses 704, Hazard Identification and Control and Course 716, Safety Management System Analysis.

### The Hierarchy of Hazard Control Strategies

Controlling hazards and exposures are the two basic strategies for protecting workers. Controlling hazards are more effective than controlling behaviors, and for good reason. If you can eliminate the hazard, you don't have to worry about exposure due to human behavior. Traditionally, a "Hierarchy of Controls" has been used as template for implementing feasible and effective controls.

ANSI Z10-2012, Occupational Health and Safety Management Systems, encourages employers to employ the following hierarchy of hazard controls:

### Controlling Hazards

1. **Elimination.** "Design out" hazards and hazardous exposures.
2. **Substitution.** Substitute less-hazardous materials, processes, operations, or equipment.
3. **Engineering controls.** Isolate process or equipment or contain the hazard.

## Controlling Behaviors

4. **Administrative/work practice controls.** Job rotation, work scheduling, training, well-designed work methods, and organization are examples.
5. **Personal protective equipment.** Includes but is not limited to safety glasses for eye protection; ear plugs for hearing protection; clothing such as safety shoes, gloves, and overalls; face shields for welders; fall harnesses; and respirators to prevent inhalation of hazardous substances.

As you can see, the control strategies first try to control hazards through elimination, substitution, or engineering. If the hazards can't be eliminated, replaced, or engineered, the hierarchy next attempts to control exposure to hazards through administrative methods and personal protective equipment. It's important to understand that:

- ) Elimination, substitution, and engineering controls are independent: they do not rely on behavior to be effective.
- ) Administrative, work practice, and PPE controls are dependent: they rely on compliant human behavior to be effective.

The "big idea" behind this hierarchy is that the control methods at the top of the list are potentially more effective and protective than those at the bottom. Following the hierarchy of controls leads to the implementation of inherently safer workplace environments, where the risk of illness or injury has been substantially reduced. Now, let's take a closer look at the hierarchy of control strategies.

### Elimination

Totally eliminating hazards, while most effective at reducing exposure to hazards, also tends to be the most difficult to implement in an existing process. This approach involves the initial design or redesign of tools, equipment, systems, production processes, and facilities in order to eliminate hazards associated with work.

If the machinery, equipment, or process is still at the design or development stage, eliminating hazards may be inexpensive and simple to implement. However, for an existing process, major changes be that can be very expensive. In the long term, even expensive changes that eliminate serious hazards may be cost effective.

Examples of elimination controls include:

- ) Remove hazard from work zone, e.g., with exhaust ventilation to remove hazardous atmosphere.
- ) Signs, labels, alarms, and flashing lights give warnings. This is only successful if workers comply with the warnings.
- ) Two-hand controls, safety switches, and hand guards to prevent "caught-in" and other accidents.
- ) Ergonomically-designed tools to prevent cumulative trauma and other disorders.
- ) Use of laser and enclosure to reduce excessive noise.
- ) Replace the use of ladders with extension poles to change ceiling light bulbs to eliminate fall hazards.

## Substitution

Substitution also focuses on doing something with the hazard, itself. It is simply replacing hazardous materials, processes, operations, machinery, and equipment with those that are less hazardous to reduce the severity of exposure. If you can't eliminate the hazard, then your thought should be, "how can I substitute this hazard with something less hazardous?"

Examples:

- ) Replacing defective tools, equipment, machinery.
- ) Replacing a toxic chemical with a less/non toxic chemical.
- ) Replacing hazardous materials such as abrasives.

Replacing hazardous chemicals, materials, tools, equipment or machinery may be expensive, but not as expensive as the average direct and indirect costs of a lost work time injury. According to the National Safety Council, is \$34,000 and over \$1 million to close a fatality claim.

## Engineering Controls

Engineering controls use Prevention through Design (PtD) methods to prevent injuries and illnesses by "designing out" the hazards and risks. This approach involves the design or redesign

of tools, equipment, systems, work processes, and facilities in order to reduce or eliminate the hazards associated with work.

PtD considers what is needed to protect workers throughout the life cycle process, machinery or and/ or process is being designed. The life cycle starts with concept development, and includes design, construction or manufacturing, operations, maintenance, and eventual disposal of whatever is being designed, which could be a facility, a material, or a piece of equipment.

It's worth saying again: well-designed engineering controls are highly effective in protecting workers and will typically be independent of worker interactions to provide this high level of protection: no matter what workers do, they won't be exposed to hazards.

Examples of effective engineering controls include:

- ) remove hazard from work zone, e.g., with exhaust ventilation
- ) two-hand to operate machinery
- ) use warning devices that stop operation if there is entry into hazard zone
- ) safety switches, hand guards, barriers, and machine guards
- ) redesign workstations and tools to best accommodate all workers
- ) ergonomically-designed tools
- ) automate processes to reduce worker exposure to repetitious movements
- ) use of laser and enclosure to reduce excessive noise
- ) enclosing a noisy machine
- ) presence-sensing devices
- ) place machine guards on a conveyor belt
- ) use a mobile scaffold

- ) use a laser cutting machine to cut down on noise
- ) ergonomically-designed tools and equipment

When considering engineering controls, you should think about the feasibility, costs, and ease of implementation of replacing or redesigning the equipment. OSHA expects your employer to consider these first three control strategies before employing administrative controls or personal protective equipment (PPE).

### Administrative Controls

When exposure to the risk is not, or cannot, be minimized by other means, you should introduce administrative and work practice controls to reduce the risk. Administrative controls address how the work is structured, and direct people to work in a safe manner. They help establish effective processes and procedures in the workplace that reduce risk of injury and illness. A few examples include:

- ) limiting the amount of time someone is exposed to hazards
- ) written operating procedures
- ) safety and health policies, rules, and guidelines for employees
- ) alarms, signs, and labels
- ) use of the "Buddy system," especially in hazardous operations
- ) training on safe work practices and procedures
- ) requiring two or more workers to lift heavy loads
- ) worker rotation to minimize the duration of exertion, repetitive motions, and awkward/uncomfortable positions.
- ) written operating procedures, work permits, and safe work practices
- ) procedures that ensure workers are using and maintaining pneumatic and power tools properly



**Work practice controls.** These controls also focus on the way workers do their jobs to reduce exposure to hazards. Work practice controls help to limit exposure by decreasing the following factors:

- ) the frequency of exposure to the hazard,
- ) the duration of the task that exposes the employee to the hazard, and
- ) the number of employees exposed to the hazard.

**Preventive Maintenance.** The best way to prevent breakdowns or failures is to monitor and maintain your equipment regularly. Determine what hazards could occur if your equipment is not maintained properly and plan to detect failures before they occur.

Administrative and work practice controls used as the primary controls for protecting workers have also proven to be less effective than elimination, substitution, and engineering because the focus is on controlling employee behaviors rather than hazards. An important principle to remember is that "any system that relies on behavior is inherently unreliable."

### Personal Protective Equipment (PPE)

Personal protective equipment is equipment worn to minimize exposure to hazards that cause serious workplace injuries and illnesses. These injuries and illnesses may result from contact with chemical, radiological, physical, electrical, mechanical, or other workplace hazards. Personal protective equipment may include items such as gloves, safety glasses and shoes, earplugs or muffs, hard hats, respirators, or coveralls, vests and full body suits.

When engineering, work practice, and administrative controls are not feasible or do not provide sufficient protection, employers must provide personal protective equipment to their workers and ensure its proper use. PPE should be used in conjunction with, not instead of, the other hazard control strategies. A common mistake some managers and supervisors make is that they try to save a little money when purchasing PPE. Do not skimp on quality PPE: it can save a life.

Employers are also required to train each worker required to use personal protective equipment to know:

- ) why it is necessary
- ) when it is necessary

- ) what kind is necessary
- ) how to properly put it on, adjust, wear and take it off
- ) limitations of the equipment
- ) proper care, maintenance, useful life, and disposal of the equipment

If PPE is to be used, a PPE program should be implemented. This program should address the hazards present; the selection, maintenance, and use of PPE; the training of employees; and monitoring of the program to ensure its ongoing effectiveness.

### Module 3 Quiz

Use this quiz to self-check your understanding of the module content. You can also go online and take this quiz within the module. The online quiz provides the correct answer once submitted.

- 1. Hazard control strategies attempt to eliminate or reduce \_\_\_\_\_.**
  - a. probability of severity and severity of a near miss
  - b. exposure to hazards and probability of severity
  - c. unsafe behaviors and poor performance
  - d. hazards and exposure to hazards
  
- 2. Which hazard control strategy is most effective in protecting employees?**
  - a. Elimination
  - b. Engineering Controls
  - c. Personal Protective Equipment
  - d. Administrative Controls
  
- 3. Which of the following hierarchy of controls uses solutions that are independent of human behavior?**
  - a. Work Practice Controls
  - b. Engineering Controls
  - c. Personal Protective Equipment
  - d. Administrative Controls
  
- 4. Which Hierarchy of Controls strategy addresses how work is to be performed?**
  - a. Elimination
  - b. Engineering Controls
  - c. Personal Protective Equipment
  - d. Administrative Controls

**5. What is a common mistake some managers and supervisors make when they purchase PPE?**

- a. They neglect other hazard control strategies
- b. They neglect the advice of the safety committee
- c. They try to save a little money when purchasing PPE
- d. They assume PPE is the only protection required by OSHA

## Module 4: Providing Safety Training

### Introduction

I don't think you need convincing about the importance of training employees on safe work procedures. You wouldn't be taking this course unless you appreciated instruction and training. In this module, we will be covering your safety instruction and training responsibilities, the safety topics that need to be trained, and the best way to train them. The primary goal of safety education is to shape attitudes. Why? Well, a very important relationship exists among education, attitudes, and behavior.

*Safety instruction affects attitudes.*

*Attitudes, in turn, shape behaviors.*

Formal safety instruction and training are important in improving an employee's ability to work safely. Instruction is important because it gives people knowledge about safety and **why** it is necessary. Safety instruction does this by emphasizing the natural and system consequences of personal behaviors, actions, and activities. Safety educators call this, "tying safety training to accountability." What are the natural and system consequences we're talking about?

- ) Natural consequences explain how employees will physically suffer if they fail to comply with safe behaviors. "If you don't use the harness, you'll probably be killed if you fall."
- ) System consequences explain how employee behaviors will result in discipline and recognition/reward for their behaviors. "If you fail to use the harness, you'll be terminated from employment. If you consistently use the harness, you will be recognized and rewarded."

Training, on the other hand, primarily tells the learner "how" to do something. It gives an employee the knowledge and, through practice, the skills to actually accomplish safe work procedures. Both education and training are necessary components in every training presentation.

### Why Employees Don't Comply with Safety Rules

In *Why Employees Don't Do What They're Supposed to Do*, Ferdinand F. Fournies states the number one reason employees do not perform to expected standards is that they don't know

why they should do them. The second most common reason is that employees do not know how to do the task correctly. Education and training, when applied together, strike at both of these causes for substandard performance.

### **Responsibilities Should Be Given to Supervisors**

To best ensure safety education and training is given to all workers, supervisors should be assigned safety training responsibilities. And, because we are often driven by potential consequences in our actions and behaviors, training without accountability is always ineffective.

### **Supervisors Should Be Trainers**

Here's why: any educator, instructor, or trainer will tell you that every time they present a session, they learn more and gain greater understanding of the subject.

As a supervisor trains, he/she gains greater insight and expertise on the procedure or process he/she are training. Consequently, he/she is better qualified to supervise for safety and more confidently manage accountability. Workers will more likely perceive their supervisors as competent and knowledgeable in safety as well as other operations. "Hey, I can't get away with anything." (Isn't this a perceived consequence that shapes employee behaviors? :-)

### **When Safety Training Should Occur**

As a supervisor, your employer may assign training responsibilities to you. If you train, or delegate the training to another person in your department, it's important to incorporate safety into the training. Initial safety orientation should occur when a new worker is hired, and more specific safety training must take place prior to the worker starting any job that exposes him or her to a safety hazard.

### **A Case for Initial Orientation**

It's important that your company educates new workers about your safety standards and expectations immediately after being hired. Two primary reasons new employees require initial safety orientation are associated with the concepts of common sense and corporate culture.

### **Training at Safety Meetings**

Safety meetings, or "tailgate" meetings, can be a great time to do some safety training. It doesn't have to be long, just impactful!

## Common Sense or Individual Good Sense

One mistake a supervisor may make is to assume that a new worker has common sense about workplace safety. Webster's dictionary states that common sense is the "ability to make sound judgments." But, does common sense actually exist? Good question, so let's take a look at how common sense is developed.

*Werthin's Law states: "Assumptions are the mother of all screw ups."*

How do we develop our "sense" of things in our environment? We do it primarily through formal education, observation, and personal experience. Is that education, observation, and experience the same for everyone? I think we can agree each individual obtains very unique life experiences and education. What's the result? An individual, unique sense about our environment (the way things are, how to act, and what actions are appropriate).

I remember one student in class who firmly stated I was full of baloney. I asked her to give me an example. She responded saying, "everyone knows what to do if someone is choking." I asked her what that might be. She said, "Well, the Heimlich maneuver." I asked the class how many of them knew how to do the procedure. Some, but not all, of the students raised their hands. I rested my case.

## Every Culture is Different

Another mistake a supervisor may make is to assume the corporate culture (standards and expectations) of a new worker's previous employer is similar to their own. Such may not be the case. A new worker may have been exposed to an entirely different set of expectations and standards at their previous place of employment—and they will bring these standards with them. If you ask a new employee if they know safe work procedures for a given task, they may reply positively, but the reply is based upon the previous company's procedure, which may be quite different from the procedures required by your company.

Because a new worker may lack the necessary individual sense to work safely in a particular workplace, it's important to adequately educate and train every new employee before they actually start work. Each employee needs to know why and how to do accomplish a procedure your way from the start.

## Training Topics

The answer to that question depends on the nature of the hazards present in your workplace. Let's divide the answer into two categories:

1. General safety concepts and principles that should be taught to everyone in the workplace.
2. Specific safety subjects unique to your industry or work process taught to affected employees.

General and specific safety topics should be trained before new employees start work.

Be sure your organization is familiar with OSHA training requirements.

## Important Guidelines About Safety Training

*Demonstration:* Workers should demonstrate that they have both the knowledge and ability to perform a task safely before they are allowed to begin work.

*Retraining:* Any time the supervisor thinks a worker has inadequate knowledge or ability to perform a task safely, that worker should receive retraining.

*Certification:* Safety training should be certified. This means the worker and the supervisor/trainer should place their signatures on a document that states:

- ) The nature of the safety training is understood.
- ) The date of the safety training is verified.
- ) The supervisor/trainer has answered all questions to the worker's satisfaction;
- ) The worker has demonstrated adequate safety knowledge.
- ) The worker has demonstrated proper safety procedures to the supervisor's/trainer's satisfaction.



## Model Training Strategy

The "show and tell" model for on-the-job training has been, and is still, the best method for training specific safety procedures. Measurement occurs throughout this process while keeping the employee safe from injury while learning. If, in using this training method, the employee is not exposed to hazards that could cause injury, you may be able to delete step 3. Otherwise do not skip a step.

### *Step 1—Introduction*

The instructor tells the trainee about the training. At this time, the instructor emphasizes the importance of the procedure to the success of the production/service goals, invites questions, and emphasizes accountability.

### *Step 2—Trainer shows and tells*

In this step, the student becomes familiar with safe work practices in each step and why they are important. The trainer explains and demonstrates each step, and responds to any questions the learner might have. The trainer continues to demonstrate and explain each step until the learner understands what to do, when and why to do it, and how to do it.

- ) The trainer **DESCRIBES** each step in the task or procedure and then **PERFORMS** each step while the student watches.
- ) The student **OBSERVES** the trainer perform each step and also **QUESTIONS** the trainer.

### *Step 3—Learner tells-Trainer Performs*

The student tells the instructor how to do the procedure, while the instructor does it. It's important to include this step if injury is possible; otherwise, this step is optional. There is an opportunity for the instructor to discover any misunderstanding and, at the same time, protects the student because the instructor still performs the procedure.

- ) The student **TELLS** the trainer how to perform each step and **RESPONDS** to the trainer's questions.
- ) The trainer **PERFORMS** each step as directed by the student and **QUESTIONS** the student about the step.

#### *Step 4—Learner shows and tells*

Now it's the student's turn. To further protect the employee, the Instructor must give permission for the student to perform each step. The student carries out the procedure but remains protected because he or she explains the process before actually performing the procedure.

- ) The student **TELLS** the trainer what he or she will do in the step, **ASKS PERMISSION** to continue, and then **PERFORMS** the step.
- ) The trainer **LISTENS** to the student's explanation of the step **GIVES PERMISSION OR STOPS** the student as needed and **OBSERVES** the student complete the step.

#### *Step 5—Trainer Concludes the Training*

Once the formal training is finished, the trainer should:

- ) Recognize the student's accomplishment - "Good job!"
- ) Reemphasize the importance of the procedure and how it fits into the overall process.
- ) Remind the employee about their responsibilities and accountability by discussing the natural consequences (hurt/health) and system consequences (reprimand/reward).

#### *Step 6— Trainer/Supervisor Validates the Training*

After the conclusion of the OJT session, the trainer, or better yet, the supervisor should observe the employee applying what they've learned in the actual work environment. Doing so results in strong documentation that helps to legally protect both the employee being trained and the employer.

**Tip:** To prove the employee has the knowledge and skills to a job safely, have the employee teach you how to do the job. If the employee can effectively train you how to do the job, he or she is qualified and you can sign them off. If they can't, you should not qualify them; it's time for some retraining.

By the way, When OSHA inspects, the compliance officer may ask employees about the job they are doing. The employees won't be able to hide their ignorance and it won't take long for the compliance officer to determine if the employee is qualified to do the job.\

*Step 7: Trainer/Supervisor Documents the Training*

The well-known OSHA adage, "if it isn't in writing, it didn't get done," is true for any kind of safety training. For OJT training, documentation should be more than an attendance sheet.

To document the training, the trainee certifies:

- ) training was accomplished
- ) questions were answered
- ) opportunities provided to do procedure
- ) accountabilities understood
- ) intent to comply

The instructor certifies the trainee has:

- ) demonstrated adequate knowledge
- ) developed the skills to complete the procedures

See the sample training certification documents in [Course 721, Module 5](#). It represents one possible way to document training.

Safety education and training are vitally important, not only to the welfare of each employee, but to the long-term survival of the organization. Safety professionals would do well to make a strong commitment to make sure a successful safety education and training system is integrated into all corporate functions.

## Module 4 Quiz

Use this quiz to self-check your understanding of the module content. You can also go online and take this quiz within the module. The online quiz provides the correct answer once submitted.

- 1. Education tells us \_\_\_\_\_ and training shows us \_\_\_\_\_?**
  - a. how, why
  - b. why, how
  - c. when, why
  - d. why, when
  
- 2. Certification of safety training should include which of the following?**
  - a. Signatures
  - b. Intent to comply
  - c. Statement of competency
  - d. All the above
  
- 3. Which of the following behaviors should be considered common sense in the workplace?**
  - a. Driving a car
  - b. Wearing hearing protection
  - c. Washing your hands
  - d. None of the above
  
- 4. Attendance rosters are considered adequate technical safety training documents.**
  - a. True
  - b. False

**5. Which of the following is not a benefit when supervisors conduct safety training?**

- a. The supervisor improves his/her knowledge and skills
- b. The supervisor gains little insight into employee aptitudes
- c. The employee is more likely to pay attention to the training
- d. Accountability is more firmly established

## Module 5: Providing Safety Supervision

### Introduction

Let's start with the basics. If you look up the word supervise in Webster's Dictionary, you'll see it means: "to look over and direct the work and performance of."

When OSHA conducts an accident investigation they may cite the employer for a "lack of supervision." They are generally saying that one or more persons who represent the employer are not adequately overseeing work being accomplished.

### The Key to Safety Supervision is Super Vision

It's extremely important for a supervisor to provide adequate oversight so that he or she may uncover hazardous conditions (materials, tools, equipment and environment) and unsafe work practices before they injure or kill a worker. Unsafe work practices, the cause of most accidents, can be effectively controlled only if the supervisor or other person in charge is out on the production floor, watching work processes.

### Delegate

If the supervisor is stuck back in the office all-day-every-day, how can he or she detect hazards? When the supervisor does uncover an unsafe work hazard, he or she can make sure it is eliminated, or exposure to the hazard is minimized.

If you find it impossible to oversee work on a regular basis, but what steps can you take to make sure unsafe conditions and practices are discovered in a timely manner? Make sure you delegate that authority to one of your employees. If a two-person work crew is sent out on a project, make sure one of them is a lead-person with safety oversight responsibilities.

OK, you are providing adequate oversight...what steps do you take when you uncover hazardous conditions or unsafe work practices? It's important that you do the right thing quickly to effectively eliminate or reduce exposure to a hazard. The approach you take when pointing out unsafe work procedures with your employees will determine your success. For example, read the following scenario.

## Scenario

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Bob is working on a large mixing machine which should have been properly locked out before beginning the maintenance. During your daily walk-through inspection, you notice he is working hard inside the mixing unit, and you notice the mixer is not locked out. Bob could be seriously injured at any time. You approach Bob, and consider what you are going to say to him. You want to send the right messages when you approach Bob.

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The right message to send is that you are concerned about his safety, the safety of other workers, and company property. In this case, you would probably tell Bob to stop work and get out of the mixing unit immediately. You would want to find out why he did not lockout the equipment, but only after expressing concern for his safety. If Bob does not believe you are concerned about him, and are only "out to get him," he will react defensively to protect himself. You won't get the truth out of him.

Find out the real reason. You may be surprised to find out that "you" may be part of the problem. Maybe Bob hasn't been properly trained, or he is under stress to "just get it done" at any cost. He might have been trained by an individual who did not value lockout procedures, and this attitude was adopted by Bob. You will find out that, most of the time, a missing or inadequate step in a process is the root cause. Don't play the blame game: go after the system cause and fix it.

### Leaders Know How to Use Recognition

Leaders understand the power sincere recognition has in creating a successful relationship with their employees. Employees should be recognized for safety whenever their performance meets or exceeds expectations.

But what are the safety behaviors you want to recognize?

Three general OSHA-mandated activities or behaviors employees should be recognized for are:

- J complying with company safety rules
- J reporting hazards in the workplace
- J reporting injuries immediately

Two other behaviors may not be mandated, but are certainly encouraged:

- ) making safety suggestions
- ) involvement in the safety committee and other activities

Each of these behaviors marks an employee as a professional. Complying with safety rules indicates a worker values safety, and that they have the personal discipline to follow important company policies. Reporting hazards in the workplace may save lives and substantially reduce accident costs. Reporting injuries, no matter how minor, as soon as possible is highly professional because it minimizes the negative impact on both the worker and the employer. It is a “win-win” situation. You'll learn more about the effective application of consequences in Module 7.

### **Withholding Injury Reports**

Believe it or not, in America today, some companies do not recognize any of the above appropriate safety behaviors. They recognize employees for a common inappropriate behavior that unfortunately may be repeated frequently—and results in long term increased workers' compensation premiums. What is that behavior?

You may have guessed it. The most common inappropriate behavior practiced by employees is failing to report injuries. When companies set up reactive incentive programs that reward a group of workers for zero reported injuries over a given period, peer pressure to withhold injury reports develops.

The greater the rewards, the stronger the peer pressure. This occurs because the injury may be seen by others as a threat to their own success. "Hey, we want our pizza party. Don't mess up our chances." You can tell when your company may have a reactive incentive program when the banners go up declaring "80 Bazillion Work Hours Without a Reported Injury!" When the number of injuries becomes the key measurement, you can be sure there are people at work who are really hurting, but will not report their injury because they want to be loyal co-workers who don't ruin it for everyone else.



*A student told OSHA Academy director, Steve Geigle, in a training session about how her son did not report his finger being amputated because he didn't want to spoil the department's safety record. How he "hid" it from his supervisor, we don't know... But, that's how bad it can get!*

The problem with this situation is, yes, you do reduce the number of OSHA 300 log entries, but each recorded injury is usually more severe. And, the **severity** of injury has more impact on workers compensation premiums than the number of OSHA 301 First Report of Injury Reports submitted. Consequently, you may have fewer reported injuries but higher workers compensation costs. So, in your effort to reduce costs through a reactive incentive program strategy, you actually increase costs.

### **Management-Level Behaviors**

Inappropriate safety behaviors may occur at any level of the organization. An example of an inappropriate supervisor level safety behavior would be allowing employees to use unsafe practices in order to meet production goals. Or, supervisors may simply ignore company safety rules. These very inappropriate behaviors send very clear messages to employees that safety is not as important as production. These behaviors are more likely to occur when the supervisor is working under pressure to produce or in a fear-driven culture that creates a conflict between production and safety. Or, supervisors may think safety is the job of the safety director. Messages sent to employees in such a culture are likely to be similar to these:

- ) "If you work fast, your job is secure."
- ) "If you work safe, your job may be in jeopardy."

*In this culture, when job security is on the line, working fast will take priority over working safe. However, in a world-class safety culture, job security depends on working safe, not fast.*

Improving supervision is both a science and an art. You can learn all the technical aspects of supervision (the science), but only experience, with all its successes and failures, will improve your skills to that of a true artist. Jump here for a few tips on [improving supervision](#).

## Safety Leadership

That's a very important question. Does a controlling leadership style, born from a lack of trust in employees, work in the safety arena? Not usually. It is based on incorrect assumptions about human nature. Some of these assumptions include:

- J Management makes decisions, drives the process, and organizes people and production only for economic gain.
- J Workers must modify their behavior to fit the needs of the organization. They must be directed, controlled, even coerced in this effort.
- J Management must be actively involved to prevent passive, resistant, or counterproductive employee behavior. Employees must be persuaded, rewarded, punished, or controlled to prevent them from being indolent, slothful, or just plain lazy. Because employees lack ambition, dislike responsibility, and prefer to be led, management's task is to prod employees along.

On the other hand, correct assumptions are expressed in what may be called a "tough caring" leadership style that reflects a no-nonsense approach to safety as a result of a genuine concern for employee safety. These correct assumptions include:

- J Management and employees make decisions and drive the production process for economic gain.
- J Workers are not passive and lazy by nature, but have become so due to experience and socialization in organizations. When motivated they are capable of self-directed work behavior and decision making.
- J Employees seek safety, job security, responsibility, and recognition. They want to develop a high degree of pride in the work they accomplish. Management's challenge is to provide employees with the means to recognize their potential, and work at the highest possible level.
- J Management organizes the workplace to best provide employees with the resources they need to be safe and achieve their own goals and objectives while supporting organizational success.

Adequate supervision means proactively developing a workplace culture that prevents injuries and illnesses. It's the combination of effective management and sound leadership. Because safety is critical to both the welfare of the employee and the company, only a tough caring leadership style, effectively adopted by management, will benefit the company safety and health culture in the long term.

## Module 5 Quiz

Use this quiz to self-check your understanding of the module content. You can also go online and take this quiz within the module. The online quiz provides the correct answer once submitted.

- 1. According to OSHA's interpretation, supervision should be thought of as providing adequate \_\_\_\_\_.**
  - a. accountability
  - b. oversight
  - c. training
  - d. recognition
  
- 2. Which of the following is a good example of poor safety leadership?**
  - a. Insisting on compliance with safety policies and rules
  - b. Personally, getting involved in the safety training process
  - c. Cutting the employee some slack to ensure positive feelings
  - d. Providing quality personal protective equipment
  
- 3. What's the solution to the problem when a supervisor is unable to adequately oversee work being done?**
  - a. Delegate the authority to oversee
  - b. Tell employees to be extra careful
  - c. Establish electronic communications
  - d. Take the chance, after all, OSHA is not likely to inspect
  
- 4. Why is the first line supervisor the key to day-to-day successful workplace safety?**
  - a. Downsizing has flattened organizational structure
  - b. Direct oversight, communication and relationships are developed
  - c. Oversight is not as crucial as leadership
  - d. Top management turns the key

5. The assumption that "workers are usually productive, desiring to do a good job," is most likely to be made by a person demonstrating a \_\_\_\_\_ - \_\_\_\_\_ leadership style.
- a. controlling, caring
  - b. tough, caring
  - c. tough, controlling
  - d. warm, fuzzy

## Module 6: Ensuring Accountability

### Introduction

The supervisor, as an "agent of the employer," is charged with carrying out a very important responsibility: that of holding employees accountable for their actions. And, of course, the supervisor himself or herself is held accountable for carrying out this very important leadership responsibility.

Before a safety accountability system can be effectively implemented and applied, it must be understood. It's important to understand what accountability is, and how it functions to ensure safety system effectiveness. To better understand accountability, let's answer some very important questions:

- ) What is accountability?
- ) What are the behaviors for which an employee should be held accountable?
- ) How does a supervisor measure those employee behaviors?
- ) What are the obligations management must fulfill before holding employees accountable?
- ) What are appropriate and effective consequences?

With the above questions in mind, let's take a look at accountability in the workplace, and how we can implement and apply it.

### Accountability

If we reference Webster's Dictionary, "accountable" is defined as being "responsible, liable, explainable, legally bound, subject to." In the workplace, employees are obligated to comply with policies, rules, and standards. Accountability also implies that our performance is measured and that we'll be subject to some sort of consequences depending our ability to meet the obligations that have been assigned to us.

## Accountable Systems

Now that we're a little more familiar with the concept of accountability, let's examine what an effective accountability system looks like. There are five critical elements to an effective accountability system. Each of these elements must be present, or the system will be doomed to fail.

### Element 1: Established Standards of Performance

Established standards inform everyone about expected levels of performance and behavior. Standards of performance should be in writing and clearly stated so that everyone understands them.

Standards of performance include the mission and vision statements, policies, written plans, job descriptions, procedures, and safety rules.

### Element 2: Resources to Achieve those Standards

If the employer is going to hold employees accountable to perform to standards, he or she has the obligation to ensure that those employees are provided the resources to achieve those standards. This obligation is detailed in OSHA's "General Duty" clause below:

*OSHA Act 1970- Section 5: Duties*

*(a) Each employer -- 29 USC 654.*

*(1) shall furnish to each of his employees employment and a place of employment which are free from recognized hazards that are causing or are likely to cause death or serious physical harm to his employees;*

*(2) shall comply with occupational safety and health standards promulgated under this Act.*

The employer may not be justified in administering progressive discipline unless all resources to help employees achieve established standards are provided. If, in fact, all resources are provided, the employer will probably have many opportunities to recognize and reward employees for meeting and exceeding those standards. What resources are necessary? That depends on the task, but generally employees should be provided:

- ) Safe tools, equipment, machinery, materials and facilities so employees can safely produce or provide the highest quality products or service. The place of employment

should also provide a healthful physical environment that ensures minimum exposure to extremes in noise, toxic chemicals, hazardous atmospheres, and temperatures.

- J) Work procedures and practices that makes sure employees are free from hazards that will cause serious injury or illness. It also means a healthful psychosocial environment that minimizes distress by making sure employees have adequate control over the various aspects of their work life. This includes healthful relationships with co-workers and management.

### Element 3: A System of Measurement

Once performance standards are established, processes should be developed to measure employee and manager behaviors against those standards. You are probably familiar with the process OSHA uses to measure your employer's safety performance. They conduct workplace inspections and issue citations.

Measurement implies more than merely observing behaviors. It's actually keeping track: quantifying behaviors. You put numbers to something. In the workplace, it's important that supervisors measure their employees' safety behaviors. And, managers should be measuring supervisors' activities. OSHA measures employer performance through an inspection process. They measure, they do not merely observe. And, as you know, OSHA issues citations that may include monetary penalties.

In an effective accountability system, the employer also conducts inspections to measure how well employees at all levels are meeting the established standards in element one. Take a look at more information on the [measurement process](#).

By the way, to find out when/if your employer was last inspected/investigated by OSHA and the results, [click here](#).

### Element 4: Appropriate Application of Effective Consequences

Without the **expectation** of consequences, accountability has no credibility and will not be effective. No consequences = no accountability. Effective consequences should meet certain criteria to be effective. This is the element with which everyone is probably most familiar. Unfortunately, in some companies, consequences are either not appropriate, not effective, or both.



### *The Criteria for Appropriate Consequences*

- J They are justified.
- J They correspond to the degree of positive or negative results of the behavior.
- J They are applied consistently throughout the entire organization.

### *Are Consequences Justified?*

A basic rule for any accountability system states that, "a person should be held accountable for a responsibility only if that person has control of the resources or the ability to fulfill that responsibility." If a person is being measured and held accountable for results over which they have no control, the person will attempt to gain control of those results somehow. That attempt may take the form of inappropriate behaviors. For example, a supervisor who's measured only on department accident rates may threaten to fire anyone who completes an OSHA injury report. Not only is the supervisor's behavior counterproductive for the company, it's illegal.

Your work schedule, the quality of materials provided, work assignments, production quotas, and the co-workers you work with, describe common aspects of your job that you may have little control over. Consequently, you should not be held accountable for these. On the other hand, how well you adhere to procedures, policies, rules, and carry out safety responsibilities are personal behaviors over which you do have some or complete control. You can choose to meet expectations or choose to "do it your way." The decision is yours to make. Therefore, accountability is appropriate.

### *Consequence Results*

- J Consequences should increase with the severity of the potential injury or illness that might result from the behavior. If an employee performs an unsafe work practice that could result in a fatal injury to himself or another employee, that certainly warrants a serious consequence. On the other hand, if an employee violates a safety rule that will not result in an injury or illness, a less serious consequence may be more appropriate.
- J Consequences should increase with the level of responsibility of the person performing the behavior. If an employee neglects to perform a safe work practice such as wearing his or her head protection discipline may be in order. However, if a supervisor or

manager neglects to wear the head protection, a more severe level of discipline would be in order because of the position of responsibility they assume. The supervisor or manager, in fact, gives permission for all employees to do the same. The negative impact on the safety of employees has the potential to be much greater when the supervisor or manager violates a safety rule.

- J) On the other hand, if a supervisor or manager does something positive, the net impact will likely be greater than that of one of his or her employees. Consequently, more significant positive consequences are certainly in order.

### *Consequences Consistency*

To build a high level of trust between management and labor, accountability must be applied consistently at all levels of the organization. It's important to remember that one should be held accountable only for that which he or she has control.

### *Very Important Questions*

It's critical to understand that before administering progressive discipline supervisors should first evaluate (make a judgment about) how well they have fulfilled their own accountabilities. This is important to make sure they are displaying effective leadership and justified in administering corrective actions.

Determining if discipline is appropriate does not have to be difficult. It can be a simple straightforward process. All that's required is that you honestly answer "yes" to the following five questions about leadership:

1. **Supervision.** Have I provided adequate safety oversight? I'm not stuck in my office all day. I'm overseeing their work regularly so that I'm able to "catch" unsafe behaviors and hazardous conditions before they cause an injury.
2. **Training.** Have I provided (or has the employee received) quality safety training? The employee has the required knowledge and skills to comply. The employee understands the natural and system consequences of noncompliance.
3. **Accountability.** Have I applied safety accountability fairly and consistently in the past? The employee knows he or she will be disciplined if caught.

4. **Resources.** Have I provided the tools, equipment, PPE, fall protection and other resources to do that job safely? Tools, equipment, machinery, PPE, etc. always in good working order.
5. **Support.** Have I provided adequate psychosocial support that promotes working safe?

If you, as a supervisor, can honestly answer "yes" to each of the above questions, you are demonstrating effective leadership and it may be appropriate to administer discipline because you have fulfilled your obligations. However, other safety management system weaknesses may exist that make discipline unjustified. If you cannot honestly answer "yes" to each question, it's probably more appropriate to apologize to the employee for failing to meet one or more obligations, and make a commitment to meet those obligations in the future.

### Two Sides to the Accountability Coin

Some companies think accountability is only about administering progressive discipline. They emphasize only negative consequences that result from a failure to meet standards of performance. In reality, an effective accountability system administers consequences for all behaviors in a balanced manner: consequences appropriate to the level of performance. So, what form should those consequences take?

Let's take a look at the consequences that might result from two categories of employee/management safety behavior:

- ) meeting or exceeding standards
- ) failing to meet standards

*Meeting or exceeding standards:* in an effective accountability system, positive recognition is given regularly (and hopefully often) for meeting or exceeding employer expectations.

If your company does not have a formal safety recognition program, take a look at some [examples](#).

*Failing to meet standards:* in some companies, this is unfortunately the only category that results in consequences. In an effective safety culture, corrective actions are rare and perceived as positive in the long term. Usually (not always), corrective actions involve some sort of [progressive discipline](#).

## Element 5: A Process to Evaluate the Accountability System

As a supervisor, you may not be responsible for formally evaluating the accountability system, but it's good to know that someone is. Usually, the safety coordinator and/or safety committee are involved in this activity. In some "state-plan" states, like Oregon, the safety committee is required by law to conduct an evaluation of the employer's accountability system.

The process usually involves three activities:

- J *Assessment:* you inspect the accountability system policies, plans, procedures, and processes to identify what exists.
- J *Analysis:* you then dissect and thoroughly study each accountability system policy, plan, procedure, and process to understand what they look like. The devil is in the details.
- J *Evaluation:* finally, you compare and contrast each accountability system policy, plan, procedure, and process against benchmarks and best practices to judge their effectiveness.

If you believe there are weaknesses in your employer's accountability system, make sure to take notes on the behaviors and conditions you see in the workplace that may be pointing to accountability system policies, plans, processes, and procedures that are inadequate or missing.

Accountability is an extremely important element in the safety and health management system. Having a firm understanding of the concept and program will help ensure success.

## Module 6 Quiz

Use this quiz to self-check your understanding of the module content. You can also go online and take this quiz within the module. The online quiz provides the correct answer once submitted.

- 1. Employees are generally accountable for all the following behaviors, except \_\_\_\_.**
  - a. reporting hazards in the workplace
  - b. warning other employees about hazards
  - c. enforcing compliance with safety rules
  - d. reporting injuries no matter how minor
  
- 2. Which of the following is an inappropriate accountability measure for supervisors?**
  - a. Reporting hazards in the workplace
  - b. Providing resources (materials, tools, equipment, etc.)
  - c. Enforcing compliance with safety rules
  - d. The number of accidents in their department
  
- 3. Which of the following is not a mandatory employer performance measure OSHA uses to evaluate employers?**
  - a. Providing resources (materials, tools, equipment, etc.)
  - b. Enforcing compliance with safety rules
  - c. Reporting all minor/first aid injuries to OSHA
  - d. Overseeing work to ensure safe procedures
  
- 4. Which of the following is not a criterion for appropriate consequences?**
  - a. They are justified
  - b. They are based solely on accident rates
  - c. They are consistent throughout the organization
  - d. They correspond to the positive/negative impact on the organization

- 5. Which of the following activities is not conducted to improve the accountability system?**
- a. Assess
  - b. Investigate
  - c. Analyze
  - d. Evaluate

## Module 7: Creating a Culture of Consequences

### Introduction

Why do we behave the way we do in the workplace? Why do we do the things we do? According to Aubrey Daniels, in his book, [Bringing Out the Best in People](#), "There are two ways to change behavior. Do something before the behavior occurs or do something after the behavior occurs. In the science of behavior analysis, the technical word for what comes before a behavior is antecedent. The word for what comes after a behavior is consequence."

Safety rules, regulations, policies, and training may tell us what to do and they may successfully cause us to behave appropriately, at least initially, but none of these antecedents will sustain safe behaviors in the workplace. Antecedents are effective only when paired with consequences.

*We do what we do because of consequences.*

It's critical that the supervisor understands this simple but profound truth so he or she can successfully design and use consequences that effectively shape desired behaviors in their department.

This module explains what effective consequences look like and how supervisors can use them to not only achieve safety compliance, but excellence in safety. The great thing is that creating a culture of effective consequences does not have to be rocket science: just sound management and leadership applied daily. So, let's take a look at the various kinds of consequences available to supervisors.

### The Four Categories of Consequences

There are four basic categories of consequences that motivate behaviors. The first two are positive and negative reinforcement, and attempt to increase desired behaviors. The third category, punishment, is used by the employer to decrease undesired behaviors. Finally, the last category that may actually cause the most "damage" to our corporate cultures today is extinction. According to Daniels, this last consequence is most common and quite effective in decreasing desired behaviors (a real "shoot-yourself-in-the-foot" strategy). Let's examine each of these categories.

*Positive Reinforcement*—if we do something well, we get rewarded.

To be defined as effective, any consequence must actually change a behavior toward the desired direction. Positive reinforcement is designed to increase both required (complying and reporting) and encouraged (suggesting and involvement) behaviors in the workplace.

Positive reinforcement motivates the employee to perform to receive a positive consequence. If you are asking employees to comply, positive or negative reinforcement may work fine. But, if you are promoting achievement beyond compliance (a discretionary behavior), positive reinforcement is the only strategy that's going to work. Why does positive reinforcement work so well? Because the focus is on excellence and it is success-based, not fear-based.

Some examples of the ways we might employ positive recognition include:

- J Employees who work for a given period of time are recognized for their professional performance.
- J Employees who report injuries immediately to their supervisor are always thanked.
- J Employees who report hazards that result in preventing an injury or damage receive a monetary reward.
- J Employees who suggest improvements that prevent injuries, improve procedures, or save money receive a free dinner.
- J Employees who are actively involved in a safety committee receive monthly bonuses.

Each example above represents an excellent opportunity to demonstrate sound management and leadership. This is a win-win strategy for everyone in the company and results in a success-based culture.

*Negative Reinforcement*—if we do something well, we don't get punished.

As with positive reinforcement, the purpose of negative reinforcement is to increase desired behaviors. When employees are motivated to perform primarily through negative consequences, they will do what they need to do to avoid punishment—not much more. Consequently, if the supervisor is attempting to increase compliance behaviors only (those required by safety rules, etc.), negative reinforcement may work. However, if the supervisor would like to increase discretionary behaviors (making suggestions, involvement in safety), negative reinforcement is not the most effective strategy.



It's interesting to note that OSHA employs negative reinforcement as a consequence in its enforcement process. Has OSHA been given the responsibility to enforce real safety excellence? Of course not. They measure employer's behaviors for compliance only. If an employer measures up to standards, they don't get punished. Is there any wonder then why some employers rise only to the level of compliance, but not beyond? They do safety because they have to, not because they want to. Employers fulfill their legal obligations, but nothing more.

The Voluntary Protection Program is an attempt by OSHA to employ positive reinforcement as a strategy to motivate employers to get beyond compliance and design world-class safety cultures. If the employer perceives significant positive consequences from participation in this program, the organization will likely design a safety management system that produces safety excellence rather than compliance.

Some examples of the ways we might employ negative recognition include:

- J Employees who comply with safety rules will not be punished.
- J Employees who report injuries are told to get back to work. Does the employer want injuries reported?
- J Employees who report hazards are considered trouble makers and transferred to the mid shift.
- J Employees who report hazards in a timely manner are not disciplined.
- J Employees who suggest improvements are ignored. What's the desired behavior here?

As you can see, each example above represents a missed opportunity to demonstrate sound management and tough-caring leadership. In some instances, the negative reinforcement is actually causing behaviors that decrease the company's ability to operate profitably. For instance, if the employee is "brow beat" for reporting an injury, the desired behavior actually being reinforced is withholding injury reports. Relying on negative reinforcement as the sole method strategy is a "lose-lose" strategy for everyone in the company. Negative reinforcement, when designed into the safety management system, will fit quite nicely in a fear-based corporate culture!

Punishment—if we do something wrong, we get punished.

The purpose of this motivation strategy is to decrease undesired behaviors by administering negative consequences. However, punishment is actually any consequence that decreases the frequency of any behavior! The message here is that we need to be very careful in designing consequences. What we believe to be punishment may not be perceived as such by the receiver. What is designed to be a positive consequence may be considered punishment by the receiver. Punishment should be used sparingly because the replacement behavior cannot be predicted and it is difficult to use successfully. You may stop one undesired behavior only to have it replaced with another. The threat of punishment for undesired behaviors should always be accompanied by the promise of reward for desired behaviors.

If the punishment does not decrease the undesired behavior, is it really punishment? No, at least not to the employee receiving the punishment. While one employee might "repent" after a verbal warning, another may require suspension from work before he or she perceives the consequence as significant punishment and stops an undesired behavior. If employees must be repeatedly reprimanded for performing unsafe behaviors, we may conclude that the consequences are not perceived by the employees as punishment. For instance, if analysis indicates that a progressive disciplinary process does not seem to be working to prevent undesired employee behaviors, what does that tell you about the effectiveness of the punishment strategies used in the process? It could be that the consequences are delayed or not perceived as significant.

As Daniels emphasizes, punishment only stops undesired behaviors: it does nothing to add real value to the business. Punishment does not help the employee clearly understand desired behaviors. Punishment is only reaction to undesired behaviors. To be effective, the supervisor should not punish unless he or she pinpoints and communicates the desired behavior to the employee and recognizes the employee as soon as that behavior is demonstrated.

Some examples of the ways we might employ punishment include:

- ) Employee who creates a hazard receives a written reprimand.
- ) Employee who works on a roof without proper fall protection is suspended.
- ) Employee who communicates with OSHA is fired.
- ) Employees who report hazards are yelled at. Again, what is the undesired behavior?

- J Employees who suggest improvements are ignored. What's the undesired behavior here?

Once again, each example above is a missed opportunity. In some examples, the punishment is decreasing behaviors that would be considered positive in a world-class safety culture. Punishment, as a consequence, can be useful when administered appropriately and effectively. If positive reinforcement is used effectively, you'll rarely, if ever, have to punish.

Extinction—no matter how well we do something, we don't get rewarded.

When was the last time you were personally recognized by your supervisor? Do you feel fully appreciated at work? When did you last personally recognize one of your employees? Do you believe you are doing a good job recognizing your people?

According to Daniels, extinction, or the withholding of positive reinforcement, is the most common consequence in response to desired behaviors in the workplace. In fact, he states that extinction is epidemic! We're just too busy, busy, busy...right? Or are we working under the oppression of a fear-driven workplace culture that does not support positive reinforcement?

*If people are not told they are appreciated, they will assume they are not.*

Some examples of the ways extinction occurs include:

- J Employees comply with all safety rules, but there is no recognition!
- J Employees report injuries immediately, but there is no thanks!
- J Employees report workplace hazards, but there is no recognition or reward!
- J Employees join and are actively involved in the safety committee, but there is no recognition!
- J Employees make suggestions for improvement, but there is no recognition!

W. Edwards Deming, in his text, [The New Economics](#), states that we must first remove fear in the workplace in our effort to transform corporate culture. Organizations will most likely fail in their attempt of employing total quality management strategies unless they first remove the fear-driven factors intentionally or unintentionally designed into the culture.

Here's probably the most important idea in the entire module: if first-line supervisors and managers would just thank employees more often for doing a good job, the benefits could literally transform the workplace culture.

### **There Are Thanks and Then There Are Thanks**

Designing strategies for using positive and negative reinforcement, punishment, and reducing extinction in the workplace is a very important activity. Remember, every system is designed perfectly to produce what it produces. We want to design a system of effective consequences, consequences that change behaviors. We can recognize in a way that we consider appropriate and effective, yet wonder why the result is little or no change in behaviors. On the other hand, we can recognize in such a way that results in dramatic changes in behaviors. The secret is in the design and application of the consequences.

*Effective recognition is more a factor of leadership than management.*

### **Criteria for Effective Recognition**

*Soon*—it's important that recognition occurs as soon as possible after the desired behavior. How do we make that happen? I believe supervisors are best positioned to do this. I don't believe the safety committee is. The supervisor is right there, and can recognize on the spot. When this occurs, the "act" of recognizing is perceived as leadership by the employee receiving the attention. If the safety committee is the primary group recognizing safety behaviors, an inherent delay is built (designed) into the recognition process, thereby decreasing the effectiveness of consequences.

*Certain*—the employee knows that they will be recognized. They are also able to tie the recognition to a specific behavior. The sooner the employee is recognized after the behavior, the stronger the link between the behavior and the consequence. Safety, because we're talking about life and limb, is too important to play games with. Don't design recognition systems that award consequences based on chance, or luck. Be careful not to make tangible rewards so certain that they are perceived as "entitlements" as they may lose their value as rewards.

*Significant*—positive recognition is perceived as more than an entitlement. It is perceived as having substantial benefit. Both the nature (positive/negative) and the significance of a recognition or tangible reward are defined by the receiver, not the person giving the recognition. Recognition and reward are benefits the employee receives over and above any

form contractual agreement such as wages or salary. Effective recognition is more than wages. You may have heard someone say, "We don't have to recognize them—that's what they get paid to do!" Do you believe that attitude will result in increased desired behaviors? Perceived significance is not necessarily dependent on the size or amount of the recognition.

*Sincere*—recognition expresses genuine appreciation. The more sincere the recognition, the more significant it will appear. Whether you are recognizing or reprimanding, your motivation is driven by a sincere desire to help the employee be safe or improve in some way. Your motives are perceived as pure by the employee. You are probably familiar with the principle that recognition should be given in public and reprimand in private. Actually, research indicates that both recognition and reprimand in private is more effective. Motives may come under question when recognition is awarded in a formal public manner. It may be perceived that managers are patting themselves on the back, or that politics had something to do with the recognition when presented in public. For example, have you ever experienced an "employee of the quarter" program that was met with less than enthusiasm by employees? Sincere appreciation, expressed in private seems to be a more effective strategy. Read Steve's [15 Secrets of Effective Recognition](#).

In conclusion, here is an excerpt from a well-known book regarding safety:

"The role of leaders in every organization is not to find fault or place blame, but to analyze why people are behaving as they are, and modify the consequences to promote the behavior they need"

Source: Daniels, E. James & Daniels, C. Aubrey. (2004). *Changing Behavior that Drives Organizational Effectiveness*. Pennsylvania University: Performance Management.

## Module 7 Quiz

Use this quiz to self-check your understanding of the module content. You can also go online and take this quiz within the module. The online quiz provides the correct answer once submitted.

- 1. Which of the following is not a characteristic of positive reinforcement?**
  - a. If the employee behaves, they receive a positive consequence.
  - b. It is required to increase non-mandatory behaviors.
  - c. It is the strategy employed by OSHA to enforce standards.
  - d. It results in success-driven corporate cultures.
  
- 2. Negative reinforcement may be usually quite effective in \_\_\_\_\_ behaviors.**
  - a. increasing compliance
  - b. decreasing discretionary
  - c. improving voluntary
  - d. decreasing mandated
  
- 3. One person's \_\_\_\_\_ may be another person's \_\_\_\_\_.**
  - a. reward, punishment
  - b. punishment, extinction
  - c. absence, extinction
  - d. extinction, reward
  
- 4. Which of the following is epidemic in both public and private sectors today?**
  - a. Positive reinforcement
  - b. Negative reinforcement
  - c. Punishment
  - d. Extinction

- 5. Which of the following criteria for effective consequences is least likely to be met in an "Employee of the Quarter" recognition program?**
- a. Recognition should occur soon
  - b. Recognition should be certain
  - c. Recognition should be significant
  - d. Recognition should be sincere

## Module 8: Safety Leadership

### Introduction

We can't complete the course without discussing the supervisor's leadership responsibilities. We touched lightly on the subject in Module 5, but, because it's so important, we need to continue the discussion. Without effective leadership, the supervisor might be able to manage quite well, but the resulting work culture may be counterproductive. If you completed Course 700, some of this information will be a review.

### What Works: Tough-Caring Leadership

This leadership model has proven most effective in the safety arena. The tough-caring leader is tough because he or she cares about the employee's safety. This leadership approach is also called the "servant-leader" model because the leader serves those he or she leads. Let's continue to discuss this leadership model below. Managers are tough on safety because they have high expectations and they insist their followers behave, and they care about the success of their employees first. This is a self-less leadership approach.

The tough-caring leadership model represents a major shift in leadership and management thinking from the selfish tough-controlling model. Managers understand that complying with the law, controlling losses, and improving production can best be assured if employees are motivated, safe, and able.

Management understands that they can best fulfill their commitment to external customers by fulfilling their obligations to internal customers: their employees.

Communication is typically all-way: information is used to share so that everyone succeeds. A quantum leap in effective safety (and all other functions) occurs when employers adopt a tough-caring approach to leadership. Rather than being the safety cop, the safety manager is responsible to "help" all line managers and supervisors "do" safety. Line managers must be the cops, not the safety department. This results in dramatic positive changes in corporate culture which is success-driven.

Although positive reinforcement is the primary strategy used to influence behaviors, tough-caring leaders are not reluctant in administering discipline when it's justified because they understand it to be a matter of leadership. However, before they discipline, managers will first evaluate the degree to which they, themselves, have fulfilled their obligations to their



employees. If they have failed in that effort, they will apologize and correct their own deficiency rather than discipline. What are you likely to hear from a tough-caring leader?

- J Positive reinforcement - "If you comply with safety rules, report injuries and hazards, I will personally recognize you."
- J Positive reinforcement - "If you get involved in the safety committee, you will be more promotable."
- J Positive reinforcement - "If you suggest and help make improvements, I will personally recognize and reward you."

You can imagine that in a tough-caring safety culture, trust between management and labor is promoted through mutual respect, involvement and ownership in all aspects of workplace safety. Now, let's discuss two leadership models that DO NOT work!

### **What Doesn't Work: Tough-Coercive Leadership**

As you learned in Course 700, in this leadership approach, managers are tough on safety to protect themselves: to avoid penalties. The manager's approach to controlling performance may primarily rely on the threat of punishment. The objective is to achieve compliance to fulfill legal or fiscal imperatives. The culture is fear-driven. Management resorts to an accountability system that emphasizes negative consequences. By what managers do and say, they may communicate negative messages to employees that establish or reinforce negative relationships. Here are some examples of what a tough-coercive leader might say.

- J Punishment - "If I go down...I'm taking you all with me!" (I've heard this myself!)
- J Punishment - "If you violate this safety rule, you will be fired."
- J Punishment - "If you report hazards, you will be labeled a complainer."
- J Negative reinforcement - "If you work accident free, you won't be fired."

As you might guess, fear-driven cultures, by definition, cannot be effective in achieving world-class safety because employees work (and don't work) to avoid a negative consequence. Employees and managers all work to avoid punishment. Consequently, fear-driven thoughts,

beliefs and decisions may be driving their behaviors. Bottom-line: a fear-driven safety culture will not work. It cannot be effective for employees and managers at any level of the organization. It may be successful in achieving compliance, but that's it.

### **What Doesn't Work: Tough-Controlling Leadership**

Managers primarily using this approach are tough on safety to control losses. They have high standards for behavior and performance, and they control all aspects of work to ensure compliance.

This leadership approach is most frequently exhibited in the "traditional" management model. As employers gain greater understanding, attitudes and strategies to fulfill their legal and fiscal responsibilities, imperatives improve. They become more effective in designing safety systems that successfully reduce injuries and illnesses, thereby cutting production costs. Tight control is necessary to achieve numerical goals. Communication is typically top-down and information is used to control. A safety "director" is usually appointed to act as a cop and is responsible for controlling the safety function.

Tough-controlling leaders move beyond the threat of punishment as the primary strategy to influence behavior. However, they will rely to a somewhat lesser extent on negative reinforcement and punishment to influence behavior. Positive reinforcement may also be used as a controlling strategy. Tough-controlling leadership styles may or may not result in a fear-based culture. Examples of what you might hear from a tough-controlling leader include:

- J Negative reinforcement - "If you have an accident, you'll be disciplined."
- J Negative reinforcement - "If you don't have an accident, you won't lose your bonus."
- J Positive reinforcement - "If you comply with safety rules, you will be recognized."

### **What Leadership is Not**

In order to better understand what leadership is, let's first discuss what it is not.

*Leadership is not power.* Power is derived from status, position, money, expertise, charisma, ability to harm, access to media, control of assets, communications skills, and physical strength. Leaders always have power, but the powerful are not always leaders. The thug who sticks a gun

in your back has "power" but not leadership. Power is self-centered, ethically neutral (can be used for good or bad), amoral.

*Leadership is not status.* Status or position may enhance the opportunity for leadership. Some may have status or position, yet haven't a shred of leadership. It's very important to understand that position is assigned from above; leadership is conferred from below.

*Leadership is not authority.* The boss will naturally have "subordinates," but, if leadership is not present, he or she will not have followers. People will follow—confer leadership—only if the person acts like a leader.

*Leadership is not management.* Management is the process of controlling systems through planning, organizing, and supervising. Managers organize system inputs - processes, policies, plans, procedures, programs. Managing is a planned activity. Leadership is more spontaneous than planned. Managers do things right. Leaders do the right things.

### **The Five Levels of Leadership**

The following description of the five levels of leadership is adapted from John Maxwell's [Developing the Leader Within You](#). It's important to understand that we're not correlating the five levels with higher positions within an organization. An employee at any level in the organization may display level five leadership, while the owner of a company may never develop beyond level one leadership. Now, let's take a look at the five levels of leadership. Think about which level best describes your current situation.

*Level One—The Boss.* The boss may have power, but leadership has not been conferred at this level. Characteristics of the work culture developed by the boss include:

- ) Dependent subordinates who are not followers and certainly not self-leaders.
- ) Subordinates do what the boss says because they have to.
- ) Subordinates do what the boss says because he or she occupies a position.
- ) Subordinates work to avoid negative consequences.
- ) The boss's influence does not extend beyond the lines of his or her job description.
- ) The boss is primarily concerned with his or her own success.

- J The boss uses, and potentially abuses, people to further his or her own ends.
- J The longer the boss remains at this level, the higher the turnover and lower the morale.

*Level Two—The Coach.* This is where real leadership begins. The leader is not demanding followership, but is, through action and example, asking for it.

- J Leadership is conferred at this level. The leader has permission to lead.
- J The leader commands, not demands.
- J The leader begins the very important journey away from self-centered attitudes towards selfless action.
- J Followers do what the leader says because they want to.
- J Followers begin to work to receive recognition as well as avoid punishment.
- J The leader begins at this level to work for the success of his or her followers.

*Level Three—The Producer.* The Level 3 producer "makes, builds, writes, develops, sells" something in a way that impresses others, so they follow that leader. The leader at this level is admired for what he or she has or is able to do for the organization. People are impressed with this person's ability to produce. The Level 3 leader is self-centered.

- J People follow the leader because of what he or she does for the organization.
- J This is where success is sensed by most workers.
- J People like the leader because of what he or she is doing.
- J Problems are fixed with very little effort because of momentum.

*Level Four—The Provider.* The leader achieving this level has learned that helping others be "all they can be" is the key to becoming fully successful. The Level 4 provider "gives, helps, encourages, supports" others so help them succeed. The Level 3 producer doesn't necessarily help others as does the Level 4 leader. The Level 4 leader is "other" centered.

- J People follow the leader because of what he does for them.
- J The "Servant-Leader" functions at this level.
- J The leader's commitment is to developing followers into self-leaders.
- J Tough-caring leadership is displayed at this level.
- J The leader has completed the transition from selfish to selfless action.
- J Do whatever you can to achieve and stay on this level.
- J It's possible for all of us to achieve this level of leadership.

*Level Five—The Champion.* When this person enters the room, everyone knows him or her. Some religious, political, social, sports, and business leaders have achieved this level. Some coaches, scout leaders, and other local leaders have, likewise, achieved this level.

- J Employees follow because of who the leader is and what he or she represents.
- J This step is reserved for leaders who have spent years growing people and organizations.
- J The transition, or transformation, from selfish motives to selfless action is complete here.
- J Few make it to this level.

## **Workplace Culture**

The most effective safety culture designs a safety management system that integrates the safety function with operations. To most successfully integrate safety into operations, it's important to consider safety as a core value rather than a priority. Values do not readily change. Priorities tend to change when the "going gets tough." When we're behind in our goals, we tend to take shortcuts in an effort to work more efficiently. The problem is that some of those shortcuts may be unsafe, increasing the probability of an accident. When safety is valued,

the message communicated from management to employees is that we produce safely or we don't produce at all. Period. There is no prioritizing.

*Safe production or no production!*

### Corporate Culture and Personality

Corporate cultures reflect "the way things are around here." One way to picture an organization's culture is to think of it as its "personality." The person at the top tends to have the greatest control over what that personality looks like. Consequently, corporate personality over time usually takes on the personality of the head of the organization.

Each department within the organization creates its own subculture controlled primarily by the head of the work group. The same relationship between culture and the personality of the person controlling the culture applies to each department within the organization. Again, the department is likely to reflect the personality and the values of the department head. I'm sure you can see how unique leadership and management styles can result in unique subcultures.

### Management + Leadership = Culture

Another way to look at culture is to consider it the sum of management and leadership styles of the leader. Management is an organizational skill, while leadership is a human relations skill. The interaction between the two determines, to a great extent, the way things are around here. With this in mind, let's take a look at some of the factors creating barriers to a successful safety culture.

Barriers to achieving and supporting a safety culture:

- J) **Counterproductive beliefs** - "Safety is 99% common sense!", "It won't happen to me." and "It's all about money." These and other perceptions send the wrong messages to employees.
- J) **Fear, distrust and stress** - According to W. Edwards Deming, this barrier must be overcome first! Fear creates struggle between safety and job security. Excellence is rare in fear-driven cultures.

- J **Lack of participation** - Do "just enough" to keep your job. Withholding positive reinforcement causes us to think, "Why bother, it doesn't matter how hard I work." Lack of participation is symptomatic of a culture of ineffective consequences.
- J **Poor communication** - Effective leadership uses communication to establish and reinforce positive relationships between management and labor.
- J **Lack of accountability** - Managers and employees fail to fulfill their assigned responsibility due to a lack of consequences. Accountability is more a function of leadership than management.
- J **Lack of intervention** - Supervisors hesitate to intervene when they observe another's unsafe behavior. May be symptomatic of pressures, lack of support from top management.
- J **Safety is prioritized** - Safety is #1. That is, until the going gets tough, usually towards the end of the production period.
- J **Lack of leadership** - Supervisors and other leaders fail to walk the talk, serve as proper role models. People want leaders—they are disappointed when their "bosses" don't act like leaders.
- J **Lack of clarity** - Expectations are unclear or inappropriate. The result is increased anxiety, distress, and decreased focus on work.
- J **"US" vs. "Them" mentality** - Adversarial relationships between labor and management. Also, results from internal competition.
- J **Lack of integration** - The safety function and activities are considered separate from operations. Safety is not a topic at business meetings. Safety personnel do not participate in operational planning.

*(Adapted from Donald H. Theune, Barriers to Safety Excellence, Light Up Safety in the New Millennium, ASSE, p. 118)*

## What's Your Leadership Style?

Here's a fun little exercise that may help in gaining some awareness about your approach to safety leadership and management. Read each statement below. Quickly indicate what you think and how strongly your feeling is about each of the statements below using one of the six responses provided before each statement. Go with your first response. Don't try to "psych" this because no one sees the results except you.

Strongly Agree +5; Agree +3; Mildly Agree +1; Mildly Disagree -1; Disagree -3; Strongly Disagree -5

1. The average person dislikes work. They will avoid it if possible.
2. To most workers, work is as natural as play or rest.
3. Workers do not need close supervision when committed to an objective.
4. Workers must be directed, controlled, or threatened to perform well.
5. Workers are usually committed to objectives when rewarded for achievement.
6. People generally dislike change and lack creative ability.
7. The average worker is self-centered, not concerned with corporate objectives.
8. Workers not only accept, but seek responsibility.
9. The average worker has a relatively high degree of imagination and ingenuity.
10. Typically, workers lack ambition, avoid responsibility.
11. Workers generally seek security and economic rewards above all else.
12. The average worker is capable of self-direction when motivated.

(Add up your score from the exercise above)

Total scores for questions 1, 4, 6, 7, 10, 11: \_\_\_\_\_ Total scores for statements 2, 3, 5, 8, 9, 12: \_\_\_\_\_



## What do your scores mean?

1. The first set of questions on the left reflect a rather negative attitude about employees that will result in a controlling leadership style. Your attitude about employees is less trusting, therefore your leadership style will tend to be more selfish and controlling.
2. The second set of questions on the right reflect a more positive attitude about employees and your attitude will likely result in more trust. Consequently, your leadership style will tend to be more selfless and more caring.

It's important to understand that, due to the limited number of statements, this exercise is only supposed to give you a general idea of your leadership style. If you don't like the results, do some serious reflection and make a decision to improve your leadership style.

## Module 8 Quiz

Use this quiz to self-check your understanding of the module content. You can also go online and take this quiz within the module. The online quiz provides the correct answer once submitted.

- 1. What leadership style is most likely to ensure effective accountability?**
  - a. Tough-controlling
  - b. Servant-leader
  - c. Tough-caring
  - d. Servant-coercive
  
- 2. The leader who is followed because of what he or she does for the organization is displaying what level of leadership?**
  - a. Level one
  - b. Level two
  - c. Level three
  - d. Level four
  
- 3. You are a supervisor. Which of the following are you likely to believe as a tough-controlling leader?**
  - a. I must be tough on safety to control losses
  - b. I must be tough so workers don't get hurt
  - c. I trust my workers to do the right thing when I'm not around
  - d. I believe I'm a consultant, not a cop to my workers
  
- 4. What's wrong with the following statement: "Safety is just common sense"?**
  - a. Nothing. It is a true statement
  - b. Safety takes common sense to work
  - c. Common sense in safety does not exist
  - d. The statement implies we are all the same

**5. Which of the following is a symptom of an unhealthy safety culture?**

- a. Employees believe consequences follow behaviors
- b. Supervisors are slow to intervene
- c. Supervisors involve employees in procedure design
- d. Employees report all injuries