Supervisors need to take a tough-caring leadership approach to safety. In other words, employers must insist their employees comply with safety policies and rules because they care about the welfare of the employee and not because it is the policy. This course will help new supervisors gain a greater understanding of their responsibilities and obligations to provide physical resources and psychosocial support to ensure work areas are safe and healthful. This course emphasizes administering appropriate and effective accountability through the application of positive and negative consequences. Supervisors will also learn how to take advantage of "opportunities for safety leadership" on a daily basis.
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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 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 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 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 understand and apply 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:

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

**Training** - conducting safety education and training.

**Accountability** - insisting everyone comply with company safety policies and rules.

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

**Support** - 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!

It's important to understand that "doing safety" to avoid OSHA violations and penalties is the least effective safety management approach. Employers who understand the long-term business benefits of world-class safety management and leadership will be more likely to develop a proactive safety and health system that far exceeds OSHA requirements. You can learn more about developing effective safety systems in OSHAcademy Course 700 Introduction to Safety Management.

1. As an "agent of the employer" you assume the responsibilities of the employer to the degree you have been given _____.
   a. authority
   b. accountability
   c. permission
   d. access

Supervisors are Directly Responsible

Successful management is the act of applying effective organizational skills, and leadership is the act of applying effective human relations skills.

Supervisors must understand and apply successful management and leadership principles to make sure their employees enjoy an injury- and illness-free work environment.

Supervisors can take immediate action to make sure their work area is safe and healthful for all employees.
In his text, *Occupational Safety and Health Management*, Thomas Anton relates 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.

2. "Management" is the act of applying _____ skills and "leadership" is the act of applying _____ skills.
   a. organizational, human relations
   b. compliance, conformance
   c. objective, intuitive
   d. supervisory, political

**What the Law Says**

Employers are assigned responsibility and held accountable by [Section 5 (The General Duty Clause) of the OSHA Act of 1970](https://www.osha.gov/pls/oshaweb/owadisp.show_document?p_table=OSHA_LAWS&p_id=71), 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.

3. The OSHA Act of 1970 states that the employer must provide a place of employment that is free from ________.
   a. recognized violations
   b. recognized behaviors
   c. recognized hazards
   d. recognized conditions

**Employer Responsibilities**

Employers have clearly defined responsibilities under the Occupational Safety and Health Act of 1970. The following list expands those basic responsibilities that are stated throughout the OSHA standards.

- **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 known to be hazardous in an industry.

- **Examine workplace conditions to make sure they conform to applicable OSHA standards.** Hazardous conditions include tools, equipment, workstations, materials, facilities, environments, and people. Employees who, for any reason, cannot work safely should be considered as hazardous conditions in the workplace. Workplace conditions can also be thought of as worker physical or psychological states.

- **Minimize or reduce hazards.** OSHA expects employers to first consider elimination, substitution, or engineering controls to eliminate or reduce hazards. Administrative
controls, work practice controls, and personal protective equipment are also strategies used to minimize or reduce hazards.

- **Make sure employees have, use, and maintain safe tools and equipment.** Supervisors need to identify and correct hazardous conditions and unsafe work practices before they result in injuries.

- **Establish or update operating procedures.** It's smart business to develop a comprehensive written plan that addresses commitment, involvement, identification, control, analysis, and evaluation activities.

- **Communicate safety policies, procedures, and rules.** This requirement is necessary so that employees follow safety and health requirements. Supervisors are key players in communicating safety expectations. Although safety committees and safety coordinators may provide help in fulfilling this responsibility, they do not assume it's solely their job.

- **Provide education and training when required by OSHA standards.** Respiratory protection, blood-borne pathogens, and fall protection are examples.

| 4. Employees who, for any reason, are not capable of working safely should be _____.
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<td>a. considered for disciplinary action</td>
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<td>b. subject to OSHA penalties</td>
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<tr>
<td>c. considered hazardous conditions</td>
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<tr>
<td>d. monitored for unusual results</td>
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- **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.

- **Report fatalities to the nearest OSHA office within 8 hours.** Report an in-patient hospitalization of one or more employees or an employee's amputation or an employee's loss of an eye, as a result of a work-related incident within 24 hours.
• **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.

• **Provide access to employee medical records and exposure records.** Access should be provided to affected employees or their authorized representatives.

• **Do 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. There will be more on this later in the module.

• **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.

The list above reflects the fact that the employer has control of work and workplace conditions. Tied to that control is accountability. Now let’s look at the general responsibilities employees have to their employer.

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<th>5. OSHA citations must be posted by the employer _____</th>
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<td>a. at or near the work area involved</td>
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<td>b. at or near the lunch room</td>
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<tr>
<td>c. at or near a public entrance</td>
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<tr>
<td>d. at or near any bulletin board</td>
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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 apply. 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:

- 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.
- 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:

- Follow all lawful OSHA and employer safety policies and rules.
- Report hazardous conditions to the supervisor.
- Immediately report any job-related injury or illness to the employer.
6. Employee compliance is not likely unless the employer _____.

a. reprimands employees for every offense  
b. reports all infractions to OSHA  
c. punishing all non-compliance regardless of fault  
d. holds employees accountable

Discrimination

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 authorizes OSHA to investigate employee complaints of employer discrimination against those who are involved in safety and health activities.

Some examples of discrimination are firing, demotion, transfer, layoff, losing an 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 existed.

The OSHA Act of 1970 gives employees only 30 days to report most 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.

   a. 15 days  
   b. 30 days  
   c. 60 days  
   d. 90 days
Module 2: Identifying Hazards

Introduction

It's more important now than ever to identify workplace hazards because fatality rates continue to increase. There was 5,190 fatal work injuries recorded in the United States in 2016, a 7 percent increase from the 4,836 fatal injuries reported in 2015, the U.S. Bureau of Labor Statistics reported. This is the first time more than 5,000 fatalities have been recorded since 2008. The fatal injury rate increased to 3.6 per 100,000 full-time equivalent (FTE) workers from 3.4 in 2015, the highest rate since 2010.

In this module, we'll discuss the five areas within which all workplace hazards exist. We'll also cover two important proactive hazard identification processes: the safety inspection and job hazard analysis (JHA). Finally, we'll look at the incident and accident investigation process and how it can effectively identify and help to eliminate hazards.

1. What is the trend in the number of annual workplace fatalities?
   a. They are unpredictable each year
   b. They are continuing to decrease
   c. They are increasing sharply
   d. They are hovering around 5,000 each year

The Five Workplace Hazard Categories

To help identify workplace hazards, categorize them into these five easy-to-remember categories:

Materials, Environment, Equipment, People and System.

- The first three categories, Materials, Environment, and Equipment, represent hazardous workplace conditions. Research and historical data indicate that hazardous conditions account for only a small percentage of all workplace accidents.

- The fourth category, People, describes employee behaviors in the workplace that contribute to or cause a great majority all workplace accidents.
The fifth category, Systems, contribute to or cause virtually all the hazardous conditions and unsafe behaviors described in the other four categories.

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

- Liquid and solid chemicals (such as acids, bases, solvents, explosives) can produce harmful effects.
- Raw materials (solids like metal, wood, and plastic) used to manufacture products are usually bought in large quantities and can cause injuries or fatalities.
- 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.

- Hazardous equipment that is improperly guarded and places workers in a danger zone around moving parts could cause injury or death.
- Lack-of a preventive maintenance program will make it difficult to ensure equipment operates properly.
- 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.
- 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.

- Poor facility design, hazardous atmospheres, temperature and/or noise can cause stress.
- If areas in your workplace are too hot, cold, dusty, dirty, messy, or wet, then measures should be taken to minimize the adverse conditions.
- Extreme noise that can damage hearing should not be present.

- 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.

- Unsafe employee behaviors include taking short cuts or not using personal protective equipment.

- 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.

- Management may unintentionally promote unsafe behaviors.

- 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.

### 2. Which of the following hazard categories includes liquid and solid chemicals?

- a. People
- b. Environment
- c. Equipment
- d. Materials

**Supervisor Role**

As a supervisor, you have four excellent tools that will help you identify and correct hazards:

1. Informal/Formal Observation

2. The Safety Inspection
3. The Job Hazard Analysis (JHA)

4. Incident/Accident Analysis

**Observation**

In effective safety cultures, a Safety Observation Program is developed and maintained. Managers, supervisors, and safety committees are educated on how to conduct informal and formal safety observations.

- **Informal Observation**: It's important that supervisors are properly instructed and trained to identify and correct the specific hazards within their departments. Supervisors should get out on the floor regularly to conduct informal observations.

- **Formal Observation**: Formal observation is usually conducted using behavior-based safety procedures. In a formal program, established steps are used to observe and the results are recorded in writing. The results are then analyzed and controls implemented.

Safety observation program education includes:

- hazard identification and control strategies;
- how to approach and inform employees about their safety performance;
- how to correct employee behaviors without the necessity of discipline; and
- how to report safety observations to improve the safety management system.

Important safety leadership messages are sent to employees when the supervisor observes, informs, and recognizes employees on the spot during random walk around observations. One important message given to employees is that the supervisor considers the safety of each employee as a core value. To be successful, observation programs should include a policy that ensures employees who are being observed are not subject to discipline.
3. When supervisors regularly conduct safety inspections, one important message sent to employees is that _____?

   a. the supervisor considers safety to be a core value
   b. the supervisor wants to stay out of trouble
   c. the supervisor cares more about the company than workers
   d. safety is a necessary cost of doing business

The Walk-around Safety Inspection

The most common hazard identification procedure is the walk around safety inspection. To be most effective, it makes sense that the safety inspection responsibility be delegated to the supervisor because, as an agent of the employer, the basic responsibility to detect and correct hazard in the work area rests with the supervisor. Important points to remember about conducting walk around inspections include:

- **Participation**: Both management and labor should be involved in safety inspections. Ineffective safety cultures rely only on safety committees to conduct safety inspections.

- **Checklist**: As you conduct the inspection, you should be looking at the hazards associated with the five MEEPS categories. Using an inspection checklist to make sure a systematic procedure is used. The only downside regards the "tunnel vision" syndrome in which hazards not addressed on the checklist are overlooked.

- **Training**: Walk around safety inspections are effective only if the inspectors are properly educated in hazard identification and control specific to the company. It takes more to keep the workplace safe from hazards in industries that see changes on a daily basis.

- **Major weakness**: 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.

Check out this short audio clip by Dan Clark of the theSafetyBrief.com. Dan has compiled the 10 most common signage and labeling questions asked about keeping workers safe and avoiding fines. These questions are from a wide range of industries.
4. Remember, as an agent of the employer, the basic responsibility to inspect the work area rests with the _____.

   a. employee  
   b. supervisor  
   c. manager  
   d. safety staff

Effective Safety Inspection Checklist

It's an effective method to use checklists when conducting safety inspections. Here is a five-step process you can use to develop an effective 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 the safety rules that apply to the work area.

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

**Step Four:** Select the rules that you believe directly apply to your work area.

**Step Five:** Finally, change each selected rule into a checklist question. Be sure to state the question as concisely as possible.

The result of following these procedures is to build 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.

**A Word About Involvement**

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: You set the example yourself by inspecting regularly, requiring employees to inspect, and recognizing your workers for inspecting and reporting hazards.
5. **What is the final step in developing a safety inspection checklist?**
   
a. Ask employees if the rules apply  
b. See if the rule can be ignored  
c. Check with management about the rule  
d. Write the rule as a question

---

#### 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 to your workplace.

The chief advantage of a JHA is adequate time is given to the analysis of both hazardous conditions and unsafe work practices. It may be possible to eliminate or reduce all 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.

6. Which process is used to analyze each step of a task to determine how to make the task safer?

a. Phase analysis  
b. Safety inspection  
c. Job hazard analysis (JHA)  
d. Walkaround audit

Investigating Incidents and Accidents

The safety inspection and the JHA can be an effective proactive processes to identify hazardous conditions and unsafe behaviors in the workplace. However, effective accident investigations are both reactive and proactive.

- Incident/accident investigations are "reactive" processes because they occur after the fact (the near-miss or injury).

- They are also proactive if they effectively identify the root causes and take corrective actions.

Make sure employees report near-misses. It's a proven fact that investigating near-miss incidents is effective for several reasons.
Investigating incidents is always less expensive than investigating accidents. They must 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. The primary purpose is to uncover the 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.

1. Secure the scene - to make sure evidence is not moved or disappears.
2. Document the scene - to gather data about the scene.
3. Conduct interviews - to determine events that led up to and include the accident event.
4. Develop the sequence of events - to determine exactly what happened in the proper sequence.
5. Conduct cause analysis - to determine surface and root causes associated with each event.
6. Determine the solutions - to develop immediate corrective actions and long-term system fixes.
7. Write the report - that emphasizes events, causes, solutions, costs, and benefits.
7. Accident investigations are considered _____ activities.
   a. reactive
   b. both reactive and proactive
   c. proactive
   d. neither reactive nor proactive

Get To The Root Causes

When conducting an incident/accident investigation, it is 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 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

8. **At what level of analysis are you trying to determine safety management system weaknesses?**
   a. Injury Analysis
   b. Surface Cause Analysis
   c. Root Cause Analysis
   d. Event Analysis
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 make 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 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 Evaluation.

1. Hazard control strategies attempt to eliminate or reduce ________.
   a. probability of severity and severity of near miss
   b. exposure to hazards and probability of severity
   c. hazards and exposure to hazards
   d. unsafe behaviors and poor performance

Controlling Hazards and Behaviors

Controlling hazards and behaviors 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 because of human behavior. Traditionally, a "Hierarchy of Controls" has been used as a template for implementing feasible and effective controls.

ANSI/ASSP Z10-2019, Occupational Health and Safety Management Systems, and ISO 450001, Occupational Health and Safety, encourage employers to use 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. **Warnings**: To raise awareness of the hazards to which employees may be exposed, warnings in the form of signs, placards, cones, and barriers are used.

5. **Administrative/work practice controls**: Job rotation, work scheduling, training, well-designed work methods, and organization are examples.

6. **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 preferred 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 warnings, 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: that's why they are preferred.
• Warnings, administrative, work practice, and PPE controls are dependent: they rely on compliant human behavior to be effective. Any solution that relies on human behavior is inherently unreliable in the long term.

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.

2. The Hierarchy of Controls attempts to prevent injuries by controlling ____ and _____.
   a. stress, workload
   b. employees, procedures
   c. attitudes, unsafe practices
   d. hazards, behaviors

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 can be very expensive. In the long term, even expensive changes that eliminate serious hazards may be cost effective.

Examples of elimination controls include:

• using exhaust ventilation to eliminate a hazardous atmosphere
• using two-hand controls, safety switches, and hand guards to prevent "caught-in" and other accidents
• using ergonomically-designed tools to prevent cumulative trauma and other disorders
• placing noisy equipment inside an enclosure to reduce excessive noise
• using extension poles to replace ceiling light bulbs

3. Which Hierarchy of Controls strategy is considered most effective in reducing exposure to hazards?

   a. Elimination
   b. Personal Protective Equipment
   c. Substitution
   d. Administrative controls

Substitution

If you can't eliminate the hazard, then your next-best strategy would be to replace it with something that is less hazardous to an exposed employee.

Examples include:

• Replacing inappropriate tools with those that are designed for the task;
• Replacing a toxic chemical with a less/non toxic chemical; and
• Replacing hazardous materials such as abrasives with non-abrasives.

Replacing hazardous chemicals, materials, tools, equipment, or machinery may be expensive, but not as expensive as the average accident costs of a serious injury (over $40,000) or a fatality (over $1 million).

4. If you can't eliminate the hazard, then your next-best strategy is to _____.

   a. install warning signs to keep employees clear
   b. train employees more frequently
   c. replace it with something less hazardous
   d. create safety rules to prevent exposure
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 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:

- using exhaust ventilation to eliminate a hazardous atmosphere;
- using two-hand controls, safety switches, and hand guards to prevent "caught-in" and other accidents;
- using ergonomically-designed tools to prevent cumulative trauma and other disorders;
- placing noisy equipment inside an enclosure to reduce excessive noise; and
- using extension poles to replace ceiling light bulbs.

When considering engineering controls, 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).
5. Why are well-designed engineering controls considered highly effective in protecting workers?

   a. They are independent of worker interactions
   b. They are less expensive than other control measures
   c. They cost less money for the same degree of efficiency
   d. They depend only on proper education and training

Warnings

With the release of ANSI Z10-2012, "warnings" have been promoted to their own hierarchy level. Previously, they were part of administrative controls. Warnings do not prevent exposure to a hazard, but they do provide a visual or audible indicator to warn people of potential danger.

Warnings can be visual, audible, or both. They may also be tactile. Some examples of warnings are:

- **Visual.** Signs, labels, tags, and flashing/strobe lights.
- **Audible.** Alarms, bells, beepers, sirens, announcement system and horns.
- **Tactile.** Vibration devices or air fans.

For instance, a door could have both a sign warning of a hazard as well as an alarm if opened. Warnings can be effective deterrents, but are not as effective as elimination, substitution, or engineering controls.

**OSHA Signs**

OSHA's [1910.145, Specifications for accident prevention signs and tags](https://www.osha.gov/pls/oshaweb/owadisp.showosahelptopic?number=1910.145) details the following types of signs:

- **Danger Signs** - Signs that alert people to specific and immediate dangers (including radiation hazards).
- **Warning Signs** - Signs that warn people of potential hazards that can lead to death.
• **Caution Signs** - Signs used to alert people to potential hazards. This class can caution people against certain unsafe practices. This class is for hazards that can result in minor (non-life threatening) accident or injury.

• **Safety Instruction Signs** - These signs offer instructions for how someone should act or perform to avoid potential hazards.

One potential problem when using warnings is the misinterpretation of the warning itself. Does the symbol or text clearly explain what the hazard is to the public? For example, if a sign only contains a written warning, someone might read the sign but not know what the warning means. Or, if an alarm sounds, what does the alarm mean? These are challenges when using warnings and why they are not as effective as higher-level controls.

6. If employees see the same signs repeatedly over a period of time, they _____.

   a. will learn how to take short cuts
   b. may eventually ignore them
   c. want to take them down
   d. will not believe them

**Administrative Controls**

When exposure to the risk is not, or cannot, be minimized by other means, introduce administrative and work practice controls to reduce the risk.

Administrative controls address how the work is to be performed, and direct people to work safely. They help establish effective processes and procedures in the workplace that reduce risk of injury and illness. Here are some examples of administrative controls:

• 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
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- 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."
7. **Under the Hierarchy of Controls, safety rules, scheduling, and training are examples of _____**.

   a. Elimination and substitution  
   b. Engineering controls  
   c. Administrative controls  
   d. Personal Protective Equipment

**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.

8. **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

We 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'll cover 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, 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 of every training presentation.
1. Bob suffers a lot of pain when he accidentally strikes his thumb with a hammer. What kind of consequence does Bob experience?

   a. System consequences
   b. Appropriate consequences
   c. Natural consequences
   d. Common sense consequences

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.

The Supervisor is the Key

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 a greater understanding of the subject.

As a supervisor trains, he/she gains greater insight and expertise on the procedure or process he/she is training. 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 and other operations. "Hey, I can't get away with anything." (Isn't this a perceived consequence that shapes employee behaviors?)
2. According to Ferdinand F. Fournies, what is the number one reason employees do not follow safety rules?

a. They don't think management "really" wants them to
b. They don't know how to do safety
c. They think safety is a waste of time
d. They don't know why they should follow them

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!

3. When should initial specific safety training occur?

a. Before being exposed to the hazards of a job
b. Within five days and annually thereafter
c. Once the new worker is settled in
d. After the start of any hazardous job
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 gets 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 unique 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 task, they may reply positively, but the reply is based upon the previous company's procedure, which may differ greatly 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 accomplish a procedure your way from the start.
4. When considering workplace safety, there is no such thing as "common sense" because every worker has _____ education, training, and life experiences.

a. the same  
b. unique  
c. common  
d. similar

**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.

5. Specific safety subjects unique to your industry or work processes should be taught to _____.
   a. all affected employees
   b. all employees
   c. authorized employees
   d. all supervisors

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. 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 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 **QUESTIONS** the trainer.

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6. In Step 1 of the "Show and Tell" safety training model, the instructor will invite questions, and emphasize _____.

   a. OSHA penalties  
   b. prerequisites for the course  
   c. accountability  
   d. historical information

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**Step 3—Trainer Shows and Asks**

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.

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**Step 4—Student Tells, Asks, and Shows**

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).

**7. When training a dangerous procedure, why does the trainer perform the task after being instructed by the student?**

a. To see if the student can teach  
b. To protect the student from possible injury  
c. To show the student how smart the instructor is  
d. To make sure the student doesn't destroy property

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

After 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 do 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.

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 OSH Training Development Module 5. It represents one 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 firm commitment to make sure a successful safety education and training system is integrated into all corporate functions.
8. **How can a trainer verify each student knows the steps of a procedure?**

   a. Have students question each other
   b. Ask the class to answer verbal questions
   c. Each student teaches the procedure to the trainer
   d. Have students complete a 10-question test
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.

1. Adequate oversight is achieved when the supervisor _____ hazards and unsafe behaviors before they cause an accident.
   a. Identifies
   b. observes
   c. detects and corrects
   d. manages

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 regularly, 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 an example, read the following scenario.

**Scenario**

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. You approach Bob and consider what you are going to say to him. You want to send the right messages when you approach Bob.

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.

2. **When you have work teams working remotely, and you can't adequately oversee their work, what should you do?**
   
   a. Have them check in periodically to verify safety
   b. Tell workers to use safety common sense in the field
   c. Tell each worker they must self-supervise for safety
   d. Delegate safety oversight to one of the workers
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:

- complying with company safety rules
- reporting hazards in the workplace
- 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 shows that workers value 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.

3. Reporting injuries as soon as possible is highly professional because it _____.

   a. shows a compliant attitude towards OSHA
   b. minimizes the negative impact on all employees
   c. keeps employees out of trouble
   d. ensures OSHA will not inspect
Withholding Injury Reports

Believe it or not, managers may unknowingly recognize employees for an inappropriate behavior that may lead to more accidents and increased long-term workers' compensation premiums. Why is that? It's because when employees have an accident, they don't tell anyone.

So, why do employees decide to withhold near-miss incident or injury accident reports? It's all about the consequences: recognition and reward.

When companies set up reactive incentive programs that recognize employees based solely on the number of injuries, peer pressure naturally builds within departments to achieve a "zero accident" record. The easiest way to do that is to withhold injury reports. Each department employee will want to be seen as a "team player," so they are reluctant to report an injury.

The greater the recognition, the stronger the will be the peer pressure. This happens because an injury may be seen by coworkers ruining their chances for recognition, be it a pizza party, bonus, or whatever.

You can tell when your company has a reactive recognition program when the banners go up declaring "80 Thousand Work Hours Without a Reported Injury!" When the number of injuries is the only measurement, you can be sure there are people at work who are really hurting but will not report their injury. We call that situation, the "walking wounded syndrome."

This actually happened: An employee accidentally amputated his finger at work. He didn't report the injury because he knew that if he did, it would spoil his department's safety record? How he hid the injury from his supervisor is unknown. That's how bad it can get when the company rewards for "zero accident!"

The problem with this situation is that, yes, you do reduce the number of reported injuries on the OSHA 300 log, but each recorded injury is usually more severe. And the severity of injury has more impact on workers compensation premiums than the number of injury and illness incident reports submitted. Consequently, you are likely to have fewer reported injuries but higher workers compensation costs. So, in the effort to reduce costs when using a reactive recognition program, total long-term safety costs actually increase.
4. **What happens when companies set up reactive safety recognition programs that reward employees based solely on the number of reported injuries?**

   a. Peer pressure builds to withhold injury reports  
   b. Accident reports are delayed or not completed  
   c. Employees work more slowly to prevent accidents  
   d. Accidents naturally decrease due to training

**Management-Level Behaviors**

Inappropriate safety behaviors may occur at any level of the organization. Examples of inappropriate supervisor safety behaviors include:

- allowing employees to use unsafe practices in order to meet production goals.  
- ignoring employees who neglect to use PPE or fall protection as required

The two examples above send a message to employees that safety is not as important as production and give employees permission for them to engage in unsafe performance.

These behaviors are more likely to occur when the supervisor is working under pressure to produce in a fear-driven culture that creates a conflict between production and safety. Supervisors may also mistakenly believe safety is the job of the safety director.

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.

Below are five strategies to improve safety supervision:

- Give lots of feedback
- Appropriate behavior is reinforced.
- Feedback is interpreted by the employee, not the supervisor.
- If the supervisor does not give feedback, the employee will get it somewhere else.
Measure performance

- Measure behaviors that the employee can control.
- Measure activity; not results.
- Comparing present activity/behavior with prior personal bests.

Describe goals and objectives in writing

- Written goals and objectives are easy to understand.
- Do accomplish - change behaviors to meet goals and objectives.
- Don't rationalize - Don't change goals and objectives to meet behaviors.

Establish concrete consistent rules

- Don't change the rules in the middle of the game.
- Employees can best improve performance with consistent rules.

Allow freedom to choose

- Promotes "I want to" thinking rather than "I have to" employee thinking.
- Supervisors believe they must tell workers how, why, what to do.
- Telling to do something without telling them why it’s important drains initiative.
5. **Inappropriate supervisor behaviors are more likely in fear-driven safety cultures because _____.**

   a. supervisors do not require personal responsibility for safety  
   b. safety managers are held responsible for safety  
   c. create a conflict between production and safety  
   d. supervisors prioritize rather than value safety

**Safety Leadership**

What’s the most effective leadership style? 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:

- Management makes decisions, drives the process, and organizes people and production only for economic gain.

- Workers must modify their behavior to fit the needs of the organization. They must be directed, controlled, even coerced in this effort.

- 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:

- Management and employees make decisions and drive the production process for economic gain.

- 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.
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.

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. 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.

6. Which of the following assumptions is made by supervisors who have a tough-caring leadership style?

a. Employees are passive and lazy by nature
b. Employees must be supervised constantly
c. Employees seek safety, job security, and responsibility
d. Employees lack common sense and must be controlled
Module 6: Ensuring Accountability

What is 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 and held accountable to comply with policies, rules, and standards. Being "held accountable" means employee performance is evaluated against expectations, and subject to one of two basic outcomes:

- If performance standards are not met, perceived negative consequences occur.
- If performance standards are met or exceeded, perceived positive consequences occur.

As you learned earlier, the supervisor is legally an "agent of the employer" and is charged with carrying out a very important responsibility; that of holding employees accountable for their actions. Before that can happen, the concept of accountability must be understood so that an effective accountability program can be developed and deployed.

To better understand accountability, let's answer some very important questions:

- 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 look at accountability in the workplace, and how we can implement and apply it.
1. Being "held accountable" means that employee performance is evaluated against expectations and subject to ______.
   a. retribution
   b. investigation
   c. consequences
   d. questioning

Elements of Accountability

Now that we're a little more familiar with the concept of accountability, let's examine the five elements of effective accountability programs. The criteria within each of these elements should be present, or effective accountability in the workplace is ultimately doomed to fail.

Element 1: Established Standards of Performance

Established standards inform everyone about desired behaviors and expected levels of performance. Standards of performance should be in writing, clearly stated, and communicated to all employees so that everyone understands them.

Standards of performance are presented in several documents:

- The mission and vision statements;
- policies, programs, and written plans;
- and job descriptions, procedures, and safety rules.

2. In an effective accountability program, standards of performance must be ______.
   a. designed by the human resources department
   b. written, clearly stated, and communicated
   c. reviewed by employees within six weeks
   d. stated in formal, legal, or regulatory language
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 that we discussed in Module 1. The employer may not be justified in administering progressive discipline unless all resources to help employees achieve established standards are provided. If all resources are provided, the employer will probably have 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.

- Work procedures and practices that make 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.

3. To hold employees accountable to perform to standards, the employer must ensure employees are _____.
   a. required to attend safety training
   b. closely supervised during work
   c. provided the resources to achieve those standards
   d. reprimanded whenever an accident occurs

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.

4. Which of the following is NOT an effective method to identify and measure employee behaviors?

a. Observation  
b. Delegation  
c. Inspection  
d. Investigation

Element 4: Application of Effective Consequences

What is a consequence?

A "consequence" is anything that happens as a result of something that happened. Another way to express it is to think of cause and effect: the initial behavior is the "cause" and the consequence is the "effect" of the cause. For every cause, there is an effect.

In each example below, the initial behavior or action is the cause: the reaction is the effect or consequence. Let's look at some examples:

- If you hit your thumb with a hammer (cause), the natural consequence is pain, injury, embarrassment, etc. (effect)
• If you think safety is not important, you take unsafe shortcuts that can get you injured.

• If a supervisor yells at you, you might yell back, apologize, go home, or even quit.

Is there any escape from consequences?

Not in the workplace. It's important to understand there is no such thing as "no consequence" for an action. You cannot escape a consequence. For instance, if a supervisor thanks a worker for making a safety suggestion, the supervisor's recognition is a consequence (positive). If the supervisor ignores the worker who made the safety suggestion, the "act" of ignoring is also a consequence (negative).

Every cause has an effect. Every action has a consequence.

Effective consequences increase desired behaviors or decrease undesired behaviors. If employee safety performance meets or exceeds the standards set by the employer, some sort of recognition should follow. On the other hand, if the employee makes an informed choice not to comply with the company's safety rules, some sort of appropriate corrective action should follow.

5. In the statement, "If you hit your thumb with a hammer, your thumb will hurt," which part of the statement describes the effect?

- a. "If you hit"
- b. "with a hammer"
- c. "If you hit your thumb"
- d. "your thumb will hurt"

Forms of Recognition

Positive Recognition

To increase the frequency of desired behaviors, supervisors may use forms of recognition that are perceived by employees as positive consequences. Positive recognition not only reinforces compliant behaviors, but it also reinforces performance beyond mere compliance. Employees will work hard to excel if they believe they will be recognized and rewarded. Therefore, positive recognition results in higher morale and productivity. Examples of positive recognition include:
• thanking employees for a job well done;
• giving employees a bonus; and
• recommending employees for a promotion.

Unfortunately, "desired" performance may not always be safe performance. In companies that prioritize production above safety, supervisors may have to work long hours and at a fast pace to meet challenging deadlines. To assure their own job security, supervisors may only recognize and reward employees for working fast, even at the expense of safety.

**Negative Recognition**

In an attempt to increase the frequency of desired performance, supervisors may rely on forms of recognition that are perceived by employees as negative. Negative recognition only reinforces compliant performance. Examples of negative recognition include:

• yelling at employees for unsafe performance;
• blaming employees whenever they have an accident; and
• writing negative comments on performance appraisals.

Employees who meet or exceed safety performance standards may see the continual withholding of positive recognition as a negative consequence. Withholding positive recognition of desired performance, no matter the reason, may eventually decrease the frequency of the performance because employees may come to believe that, "if the boss does not care, why should I?"

Ignoring desired behaviors happens every day in some companies and is probably the most common response to good work experienced by employees. It's very unfortunate because ignoring desired behaviors eventually extinguishes those behaviors.

Remember, in controlling or coercive safety cultures that rely on negative recognition, employees work safely only to stay out of trouble. Negative recognition is inherently ineffective, and results in lower morale and less productivity.
6. **Which of the following consequence strategies will most likely cause workers to perform far beyond minimum standards?**

   a. Positive reinforcement  
   b. Negative reinforcement  
   c. Negative punishment  
   d. Positive punishment

**Element 5: Appropriate Application of Consequences**

In addition to an *expectation* of consequences, they must also meet certain criteria to be appropriate.

**Three Important Criteria for Appropriate Consequences**

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

**Are Consequences Justified?**

Employees should be held accountable for their performance only if they have sufficient control of the resources and ability to perform. If employees are being measured and held accountable for performance results over which they have no control, they will attempt to somehow gain control of those results. Their attempts may include inappropriate behaviors. For example, supervisors measured only on department accident rates may threaten to fire anyone who completes an OSHA injury report. Not only is this attempt counterproductive it's illegal.

Employees may have little control over their work schedules, the quality of materials provided, work assignments, production quotas, and co-workers. On the other hand, complying with safety procedures, policies, and rules are personal behaviors over which they have some degree of control. Control also implies that employees can choose to meet expectations or choose to "do it their way." The decision is theirs to make and the degree to which they have control over their performance determines the nature of the resulting consequences.
Do consequences correspond to the impact of behaviors?

Consequences should correspond with the resulting positive or negative impact of performance. If employees perform unsafe work practices that could result in fatal injuries, that certainly warrants a serious consequence. On the other hand, if an employee violates a safety rule that would not result in an injury or illness, a less serious consequence may be more appropriate. Progressive discipline should be carefully considered.

Consequences should increase as employees assume greater levels of responsibility. If employees neglect to perform safe work practices, such as wearing eye protection, discipline may be in order. However, if supervisors or managers neglect to wear eye protection, a more severe level of discipline would be in order because of the position of responsibility they assume. Supervisors or managers, in fact, give permission to all employees to perform unsafe work practices. The negative impact on the safety of employees has the potential to be much greater when supervisors or managers violate safety rules.

On the other hand, if employees, supervisors, or managers do something positive, the net positive impact should be considered and result in recognition/reward corresponding to the degree to which their performance improved safety.

Are consequences applied consistently?

To build a high level of trust between management and labor, consequences, both positive and negative, must be applied consistently at all levels of the organization's workforce and management. Again, it's critically important to remember that employees and managers should be held accountable only for performance over which they have control.

7. Consequences should _____ as the severity of the negative impact of an unsafe behavior increases.
   a. increase
   b. decrease
   c. remain the same
   d. be monitored
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:

1. Meeting or exceeding standards, and
2. Failing to meet standards.

Meeting or exceeding standards: In an effective safety accountability system, positive recognition is given regularly 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.
8. An effective accountability program administers consequences for _____.
   a. unacceptable behaviors
   b. non-compliant behaviors
   c. all behaviors
   d. compliant behaviors

Five Very Important Leadership 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 justified. This does not have to be difficult. It can be a simple straightforward process. All that's required is that supervisors honestly answer "yes" to the following five "STARS" leadership questions:

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 supervisors can honestly answer "yes" to each of the above questions, they are demonstrating effective leadership and it may be appropriate to administer discipline because they have fulfilled your obligations. However, other safety management system weaknesses, such as inadequate safety training may exist that make discipline unjustified. If supervisors cannot honestly answer "yes" to each question above, it’s probably more appropriate to apologize to employees and make a commitment to meet those obligations in the future.

You can take the "Five Stars" leadership test by clicking on the Exercise tab online.

9. Which of the following is a question a supervisor should ask when considering discipline?
   a. "Have I provided this employee with adequate safety training?"
   b. "Have I disciplined everyone who has had an accident?"
   c. "Have I reported all incidents directly to OSHA?"
   d. "Have I covered all of my bases to deflect blame?"

Element 6: Evaluation of the Accountability Program

Although 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:

- **Identify**: you inspect the accountability system policies, plans, procedures, and processes to **identify what exists**.

- **Analyze**: 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 detail.

- **Evaluate**: 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.

Finally, 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.

10. Which of the following activities compares and contrasts each accountability system policy, plan, procedure, and process against benchmarks and best practices to judge their effectiveness?
   a. Analysis
   b. Identification
   c. Evaluation
   d. Assessment
Module 7: Creating a Culture of Consequences

Introduction

According to OSHA, safety cultures consist of shared beliefs, practices, and attitudes that exist at an establishment. Culture is the atmosphere created by those beliefs, attitudes, etc., which shape our behavior. Examples of the benefits of a strong safety culture include:

- Developing a strong safety culture has the single greatest impact on accident reduction of any process.
- A company with a strong safety culture experiences few at-risk behaviors, low accident rates, low turnover, low absenteeism, and high productivity.
- While creating a stronger safety culture improves safety, it also benefits productivity, staff retention, and the overall organizational culture.

It's important to understand that successful world-class safety cultures must include effective consequences for behaviors and performance.

1. **To be effective, what must a world-class safety culture include?**
   a. Systematic behaviors
   b. Behavioral controls
   c. Multiple antecedents
   d. Effective consequences

Consequences

This module discusses the characteristics of effective consequences and how supervisors can use them to lead their employees from mere compliance with rules to excellence in safety performance. All it takes is sound management (an organizational skill) and leadership (a relationship skill) applied daily. So, let's look at the various kinds of consequences supervisors can use to affect behaviors.
Consequence Categories

There are two basic types of consequences: reinforcers and punishers.

- **Reinforcers** are consequences that increase the frequency of a behavior.

- **Punishers** are consequences that decrease the frequency of a behavior.

There are four basic categories of consequence strategies that motivate behaviors:

**Positive reinforcement** - The supervisor reinforces desired behavior by giving employees positive recognition, such as an expression of thanks, a hand shake, or a day off work. When employees do something good, they are recognized.

**Negative reinforcement** – The supervisor reinforces desired behavior by withholding negative recognition, such as criticism, harsh words, or a reprimand. As long as employees comply, nothing perceived as negative occurs.

**Positive punishment** – The supervisor punishes undesired behaviors by doing something perceived as unpleasant, such as a poor performance appraisal, verbal warning, or an increased workload.

**Negative punishment** - The supervisor punishes undesired behaviors by withholding recognition that is perceived as pleasant or positive, such as withholding a bonus, a day off, or a promotion.

Caveat: We need to be very careful in designing consequences. What we believe to be punishment may not be perceived as such by the receiver. On the other hand, what we believe to be a positive consequence may be considered punishment by the receiver.

2. What are the two basic types of consequences?

   a. Statutory and administrative
   b. Mandatory and voluntary
   c. Reinforcers and punishers
   d. Active and latent
Positive Reinforcement

This category basically means, "If we do something well, we get rewarded." To be defined as effective, the consequence must increase the frequency of the desired behavior. Positive reinforcement can be very effective in increasing both required behaviors (complying and reporting) and voluntary behaviors (suggesting and involvement). Ultimately, positive reinforcement can be very effective in producing a world-class success-driven safety culture. Here's why:

Positive Reinforcement = Reinforcing compliance by giving positive consequences.

Positive reinforcement motivates employees to perform to receive a perceived positive consequence. If you are asking employees to comply, positive or negative reinforcement may work. But, if you are promoting achievement beyond compliance, positive reinforcement is the only strategy that's going to work. Why does positive reinforcement work so well? It's success-based, not fear-based.

Some examples of safety-related behaviors and the resulting positive recognition include:

- reporting injuries to supervisors result in being thanked;
- reporting serious hazards result in a monetary reward;
- suggesting improvements result in a better performance review; and
- active safety committee members receiving a monthly bonus.

Each example above represents an excellent opportunity for supervisors to demonstrate win-win management and leadership.

For more information on using positive reinforcement, we encourage you to read Aubrey Daniel's book, Performance Management: Improving Quality and Productivity Through Positive Reinforcement.
3. Which statement is TRUE regarding positive reinforcement?

   a. It only works to increase compliance behaviors in the workplace
   b. It can be effective in increasing mandatory and voluntary behaviors
   c. If the employee does something, they might somehow get recognized
   d. It will increase mandatory behaviors, but nothing more

Negative Reinforcement

As with positive reinforcement, the purpose of negative reinforcement is to increase desired behaviors. Unfortunately, the not-so-effective strategy is to motivate compliance by withholding negative consequences. Employees will comply with mandatory rules, but not much more. However, if the supervisor would like to increase discretionary behaviors (making suggestions, involvement in safety), negative reinforcement will not be an effective strategy.

**Negative Reinforcement = Reinforcing compliance by withholding negative consequences.**

The best example of the use of negative reinforcement in safety is the OSHA inspection process. OSHA is mandated to enforce compliance with their safety standards and uses negative reinforcement as a motivation. If, during an inspection, employers meet compliance standards, OSHA does not issue citations and penalties. Consequently, employers attempt to achieve compliance, but it’s much harder to get them interested in safety excellence.

Other examples of compliant employee behaviors that occur when negative reinforcement is the primary result include:

- Employees comply with safety rules to stop being yelled at.
- Employees work faster so they won't have to work overtime.
- Employees taking short cuts to avoid being in trouble for not meeting work schedules.
4. **Which of the following is an example of negative reinforcement?**

   a. If employees violate safety rules, they are ignored
   b. If employees comply with safety rules, they are not punished
   c. If employees comply with safety rules, they get rewarded
   d. If the employees violate safety rules, they get punished

**Punishment**

This motivation strategy decreases undesired behaviors through the use of negative consequences.

If the punishment cannot decrease undesired behaviors, it is not effective punishment. While some employees might "repent" after a verbal warning, others may not change their behavior until they receive a suspension from work. To be effective, punishment must be perceived by the receiver as significant.

According to Aubrey Daniels, punishment only stops undesired behaviors: it does nothing to increase behaviors beyond mere compliance, which adds real value to the business. Punishment does not help employees clearly understand desired behaviors. Punishment is only a reaction to undesired behaviors. To be effective, supervisors should not punish employees unless they tell employees precisely why they are being punished. To do that best, punishment should occur as soon as the undesired behaviors occur.

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 to employ total quality management strategies, unless they first remove the fear-driven factors intentionally or unintentionally designed into the culture.

**Punishment = Reducing noncompliance by using negative consequences.**

Some examples of the way punishment might occur in the workplace include:

- Employees who create a hazard receive a written reprimand;
- Employees who work on a roof without proper fall protection are suspended; and
Employees who communicate with OSHA are fired.

Punishment can be useful when administered appropriately and effectively to reduce noncompliant performance. However, if positive reinforcement is used effectively, you'll rarely, if ever, have to punish.

5. If punishment fails to decrease undesired behavior, what is the problem?

   a. The punishment needs to be repeated
   b. The punishment was applied too soon
   c. The punishment should have been verbal
   d. The punishment is not perceived as significant

Extinction

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 of recognizing your employees?

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 an epidemic! We're just too 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.

Examples of consequences that extinguish desired behaviors include:

   • Employees comply with all safety rules, but there is no recognition;

   • Employees report workplace hazards, but there is no recognition or reward; and

   • Employees are ignored when they make suggestions for improvement.

Remember, 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.
6. **Which of the following is an example of a consequence that extinguishes desired behaviors?**

   a. Employees exceed expectations and receive a pay raise  
   b. Employees who report hazards are considered trouble makers  
   c. Employees are ignored when they make a safety suggestion  
   d. Employees report injuries and their supervisor thanks them  

**There Are Thanks.... And Then There Are Thanks**

Designing strategies for using positive and negative reinforcement and punishment, and in 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 others 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 others in such a way that results in dramatic changes in behaviors. The secret is in the proper design and application of the consequences.

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

Read the [Rules for Radical Recognition](#) for a list of effective recognition principles that will help you, no matter what your role or position is in the company, effectively recognize others. Doing so can have dramatically positive results in your relationship with everyone.

Aubrey Daniels tells us, "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.)
7. **What is the "secret" to effective recognition programs?**

   a. Adequate education and training of expectations
   b. Realizing you must develop adequate antecedents
   c. The proper design and application of the consequences
   d. The use of recognition and punishment to control behaviors
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 manage well, but the resulting work culture may be counterproductive.

What Works: Tough-Caring Leadership

Tough-caring leaders are tough because they care about their employees’ safety. This leadership approach is similar to the "servant-leader" model in which leaders serve those they lead. The tough-caring leadership approach is characteristic of the following:

- Leaders understand that complying with the law, controlling losses, and improving production can best be assured if employees are motivated, safe, and able.

- Leaders understand 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 safety cops, safety managers are responsible to "help" all line managers and supervisors "do" safety. Line managers, not the safety department, must be the cops. 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.

Remember, 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!
1. Which safety leadership style best helps to ensure effective accountability?

   a. Tough-Caring  
   b. Tough-Controlling  
   c. Tough-Coercive  
   d. Tough-Coping

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.

- Punishment - "If I go down...I'm taking you all with me!" (I've heard this myself!)
- Punishment - "If you violate this safety rule, you will be fired."
- Punishment - "If you report hazards, you will be labeled a complainer."
- 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.
2. The manager who has a tough-coercive leadership approach may primarily rely on _____.
   a. verbal responses  
   b. the promise of recognition  
   c. the threat of punishment  
   d. fact-finding tools

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 most likely rely on mandatory compliance with policies, procedures, and rules to control all aspects of work.

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. Safety "directors" are usually appointed to act as safety cops who are 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 tough-controlling leaders include:

- "If you have an accident, you'll be disciplined."
- "If you don't have an accident, you won't lose your bonus."
- "If you comply with safety rules, you will be recognized."
3. **What is a tough-controlling leader most likely going to rely on to control all aspects of work?**

   a. Threat of punishment  
   b. Mandatory compliance  
   c. Recognition for compliance  
   d. Rewards for working beyond compliance

**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 don't have 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.
4. Managers _____ and leaders ______.
   a. do the right things, do things right
   b. do things right, do the right things
   c. are spontaneous, are calculating
   d. relate to people, relate to things

Maxwell’s 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.
- The boss uses, and potentially abuses, people to further his or her own ends.
- 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.
Leadership is conferred at this level. The leader has permission to lead.

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

5. At this level of leadership, a supervisor may have power, but leadership has not been conferred.
   
   a. Level 1: The Boss
   b. Level 2: The Coach
   c. Level 3: The Producer
   d. Level 4: The Provider

Level Three—The Producer. Leadership because your production: 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.

- People follow the leader because of what he or she does for the organization.
- This is where success is sensed by most workers.
- People like the leader because of what he or she is doing.
- Problems are fixed with very little effort because of momentum.
Level Four—The Provider. Leadership by developing people: You grow others. 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 to 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.

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

Level Five—The Champion. Leadership because of respect. When the champion 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. The champion is totally other-centered and has learned the "secret" - you get what you give.

- Employees follow because of who the leader is and what he or she represents.
- This step is reserved for leaders who have spent years growing people and organizations.
- The transition, or transformation, from selfish motives to selfless action is complete here.
- Few make it to this level.
6. **At which leadership level does the "Servant-Leadership" model function?**

   a. Level 2: The Coach  
   b. Level 3: The Producer  
   c. Level 4: The Provider  
   d. Level 5: The Champion

**Workplace Culture**

The most effective safety culture designs a safety management system that integrates the safety function with operations. To integrate safety most successfully 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.

7. **What's the difference between values and priorities?**

   a. Values are Top-down: Priorities are not
b. Values don't change: Priorities do  
c. Values readily change: Priorities don't  
d. Values reflect leadership: Priorities reflect management

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 look at some factors creating barriers to a successful safety culture.

Barriers to achieving and supporting a safety culture:

- 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.

- 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.

- 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.

- Poor communication - Effective leadership uses communication to establish and reinforce positive relationships between management and labor.

- 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.

- 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.
• Safety is prioritized - Safety is #1. That is, until the going gets tough, usually towards the end of the production period.

• 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.

• 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.

8. Which of the following is NOT a barrier to creating an effective safety culture?

   a. Safety is integrated with operations
   b. Assuming safety is "99% common sense"
   c. Struggle between safety and job security
   d. Hesitation to intervene when unsafe behaviors are observed

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.