

JUMP-STARTING SAFETY AND COMPLIANCE CULTURE IMPROVEMENT

2018 BBNC COMPLIANCE CONFERENCE

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A HEALTHY SAFETY AND COMPLIANCE CULTURE

Enhances industrial and personal safety, environmental protection, regulatory and legal compliance, and quality.

Increases worker trust in supervision and management.

Reduces legal and regulatory violations.

Reduces whistleblower and discrimination allegations and lawsuits.

Enhances public confidence and the corporation's reputation as a good citizen.

A FORMAL COMPLIANCE PROGRAM Is NOT ENOUGH

Noncompliant and unsafe behaviors still occur at an unacceptably high rate even though:

- Senior management has signed off.
- Code of Conduct and safety and compliance rules have been communicated throughout the organization.
- Audit, quality assurance and enforcement infrastructure is in place.

Awareness of the law, regulations, policies or procedures is not enough to compel compliant behavior.

- Behaviors are learned and become automatic only with repetition, reinforcement, and modeling by leaders.
- Straightforward processes buttress the desired outcomes.

WHY I DON'T COMPLY

Mixed incentives

- "My boss tells me to report unsafe conditions but still expects me to get the job done on time and with less help."

Poor accountability

- "Nothing bad will happen to me if I ignore the hazard or do things my own way."

Group norms

- "If I point out the hazard, my buddies will think I'm ratting on them; or if I insist on following some procedure, they'll think I'm weak."

Unnecessary

- "This procedure is overkill, simpler is safer."

Personality factors

- "Who cares - it's not my problem."

WHY I DON'T COMPLY

Ignorance

- "I did not know this was a hazard."

Lack of skill

- "I was never trained for that task."

Mistrust of authority

- "They lied to us before about safety, so how do I know they're telling the truth now?"

Personal experiences

- "Nothing bad ever happened to me before by doing it this way, so why worry now?"

Lack of incentives

- "What's in it for me? Why should I follow this much harder procedure?"

SAFETY AND COMPLIANCE DRIVERS

PROCESSES

- Problem resolution
- Continuous learning
- Effective communications
- Engaged work planning



EFFECTIVE LEADERSHIP

- Walk the talk
- Conservative decisions
- Respectful work environment



INDIVIDUAL INTEGRITY

- Personal responsibility and accountability
- Questioning attitude
- Observe, question and report concerns



CULTURE SHIFT

Shift the culture by shifting behaviors.

Identify, demonstrate, encourage and require behaviors that promote safety and compliance.

The desired behaviors are intuitive, straightforward and easily observed and measured.

ORGANIZATIONAL PROCESSES

We value learning

- We value outside and self-assessments of work activities.
- We seek out best practices.
- We ensure training is adequate to ensure competency and compliance.
- We encourage personnel to value and seek learning opportunities.

We encourage the reporting of concerns

- We encourage workers to report concerns.
- We take ownership of concerns reported by.
- We are sensitive to actions, behaviors and decisions that could dissuade the reporting of concerns.

We identify and correct problems

- We ensure that issues, degraded conditions and near misses are reported.
- We describe concerns with sufficient detail so that they can be properly classified, and evaluated.
- We ensure corrective actions are completed in a timely manner.

We plan work effectively

- We plan and execute work using risk insights, job-site conditions and in coordination with other work groups.
- We ensure procedures, work packages, and instructions are complete, accurate, and current.
- We ensure work activities are documented completely and accurately.

EFFECTIVE LEADERSHIP

I walk the talk

- I ensure tools, equipment and procedures are available to support successful and safe work.
- I am actively involved in overseeing work activities.
- I actively coach, mentor and reinforce standards.
- I foster an environment that promotes accountability.

I make conservative decisions

- I do not rationalize assumptions for the sake of completing a task.
- I take a conservative approach, particularly when information is incomplete or conditions are unusual.
- I consider the consequences when determining how to resolve emergent concerns.

I respect my people

- I treat all personnel with dignity and respect.
- I do not demonstrate or tolerate bullying or humiliating behaviors.
- I seek out ideas, concerns, suggestions, differing opinions and questions.
- I acknowledge positive performance and address negative performance.
- I ensure conflicts are resolved in an equitable and consistent manner.

INDIVIDUAL INTEGRITY

I am
personally
accountable
for
compliance

- I follow procedures as written, and stop and ask for help when they cannot be followed.
- I always use human performance tools (STAR, 3-way comm).
- I protect my teammates by observing, coaching and peer checking.
- My signature is my word of complete and accurate information.

I observe and
question

- I STOP when faced with uncertain or unexpected conditions.
- I actively participate in pre-job briefs.
- I consider potential undesired consequences before performing a task.
- I review and understand each task rather than relying on past successes and assumed conditions.

I communicate

- I ask for feedback, listen to coaching and communicate openly.
- I model compliance and safety to my teammates.
- I provide timely, clear, accurate and important information to my leaders and teammates.

MAKE THE SHIFT

IDENTIFY AND CLOSE THE GAPS

BASELINE ASSESSMENT

Purpose

- Find gaps and strengths in processes, leadership, and integrity.
- Develop tailored recommendations at the department, site, and corporate level.

Process

- Identify and examine relevant processes.
- Conduct brief survey with breakdowns by relevant characteristics (e.g., site, department, workgroup and years of service).
- Interview representative sample of leaders and workers.
- Observe work and employee engagement.

COMMON RECOMMENDATIONS

Reporting and Resolution of Employee Concerns

- A **corrective action** process for evaluating and addressing issues potentially affecting safety and compliance.
- An **Employee Concerns Program** safety-net to receive and investigate concerns that personnel do not want to raise to supervisors.

Training

- Train on the value of a healthy safety and compliance culture and the **behaviors** that create it.

Behavior Accountability

- **Reward** and **account** for compliance culture behaviors.

EMPLOYEE CONCERNS PROGRAM

Confidential alternative to reporting concerns to line management.

Resolves critical safety and compliance concerns that otherwise may not have been reported.

Promotes trust.

- Independent of line management.
- Utilizes formal investigative process for significant issues.
- Produces clear, complete and auditable investigation reports and files.

TRAINING TO JUMP-START CULTURE SHIFT

Purpose

- Introduce behaviors that support a safety culture.
- Demonstrate “what’s in it for me.”
- Introduce these themes as the foundation of a broader improvement program.

Leaders

- Smaller groups, longer program.
- Interactive and engaged discussions, role-plays and relevant case studies.
- Behaviors – including effective communication, coaching and preventing retaliation.

Workers

- Larger groups, shorter program.
- Pragmatic, straightforward, emotional connection.
- Behaviors – questioning attitude, safety focus, peer coaching, understanding leaders’ roles and responsibilities.

FOCUSED TRAINING

LEADER PROGRAM EXAMPLES

BE YOUR “BEST BOSS”



TRUE LEADERS WALK THE TALK



- Exhibit and reinforce high standards.
- Recognize and reward good safety culture behaviors.
- Communicate.
- Respond to concerns.
- Treat people with dignity and respect.
- Hold poor performers accountable.

IMPACT OF A CHILLED WORK ENVIRONMENT AND PERCEIVED RETALIATION



VS



Unaddressed safety or compliance issues.



Allegations to OSHA or other Federal or State agencies,
customers, the media.



Increased regulatory scrutiny.



Whistleblower lawsuits.

OTHER KEY TRAINING AREAS

Effective communication.

Coaching to improve performance and enhance trust.

Encouraging and addressing safety and compliance concerns.

Actions to minimize actual and perceived retaliation.

FOCUSED TRAINING

WORKER PROGRAM EXAMPLES

I AM A PROFESSIONAL

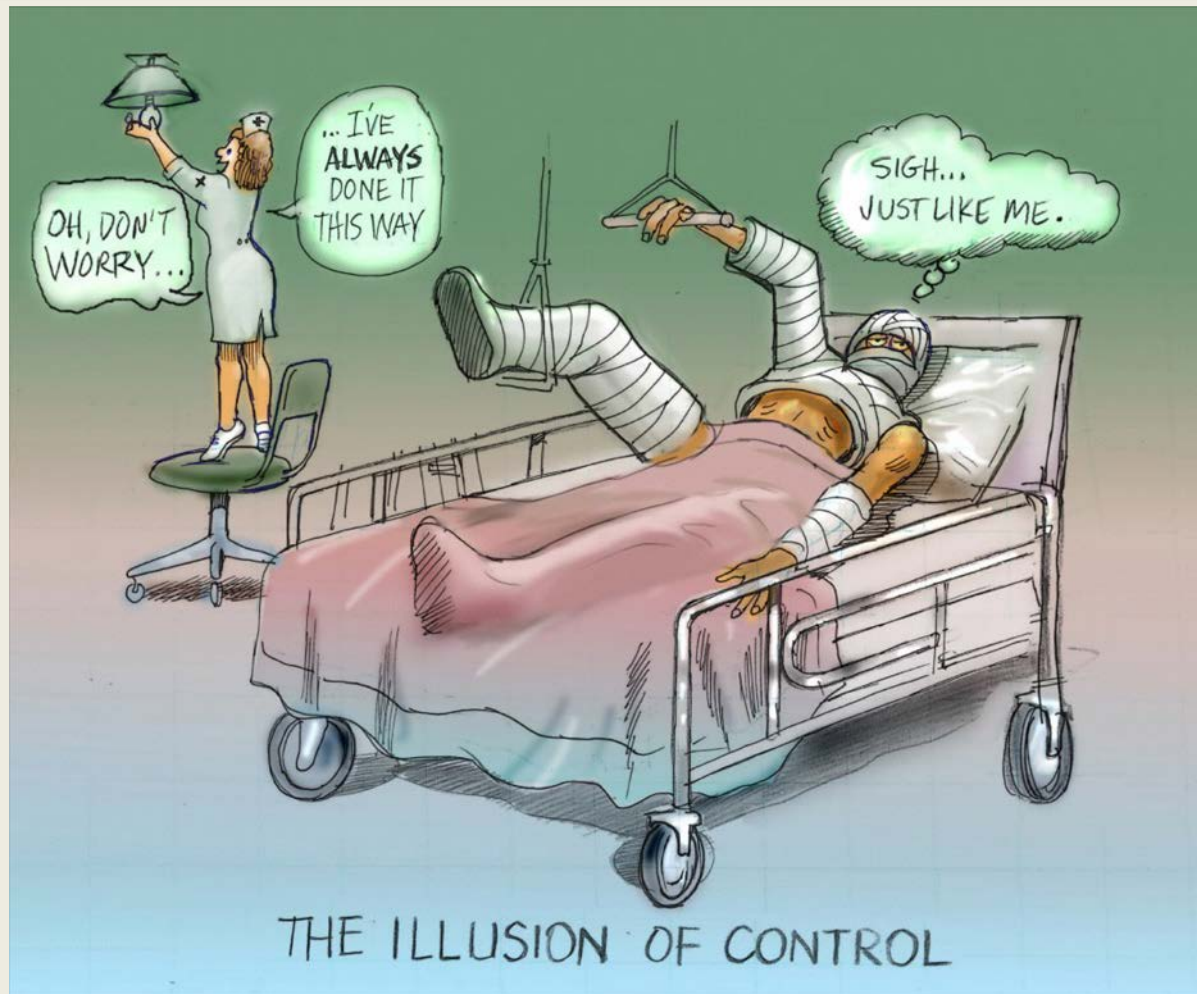


- I know the rules.
- I follow the rules.
- I encourage my teammates to do the same.
- My signature is my word.

I AM THE FIRST LINE OF DEFENSE



WE LEARN FROM OUR MISTAKES



SUMMARY

Similar behaviors underpin healthy compliance and safety cultures.

Leader and individual behaviors are learned.

Examine existing processes and behaviors to identify gaps.

Train for straightforward, beneficial and intuitive behaviors and actions.

Implement, strengthen and refine as necessary the processes that reinforce these behaviors.

QUESTIONS?

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THANK YOU!