THE BIG FIVE
at L'Oréal Operations Americas

By Jay R. Harf and Kristin K. Herman

A culture of interdependence is paramount in safety excellence processes and should be communicated in the vision, values, and interacting and guiding roles of an organization. In the words of Stephen Covey (1989), "interdependence opens up worlds of possibilities for deep, rich, meaningful associations, for geometrically increased productivity, for serving, for contributing, for learning, for growing."

Other characteristics associated with interdependent cultures include "the ability to work effectively across organizational boundaries, openness and candor, multifaceted standards of success and synergies being sought across the whole enterprise" (Palus, 2012).

It is with this culture in mind that the environment, health, safety and sustainability teams of L'Oréal Operations Americas focus on five key safety management systems elements to reduce risk. These programs, referred to at the company as "The Big Five," are the cornerstones of the leadership program:

1) Managing Effective Safety Using Recognition and Refocusing;
2) Safety Improvement Opportunity;
3) Safety Hazard Assessment;
4) Validation;
5) Powered Industrial Truck.

Program 1: Managing Effective Safety Using Recognition & Refocusing

The company's main leading indicator is a version of a behavior-based safety program that was created internally called the Measuring Effective Safety Using Recognition and Refocusing (MESUR) program. This program is based on structured and systematic meetings between managers and employees to develop the ability to identify risks in their daily activities and act to mitigate these risks. MESUR aims to make each individual aware of their good and unsafe practices. Therefore, this program allows them to act at their level to better control risks related to their activity. MESUR is a key element of the OSH management system and its implementation contributes significantly to the continuous improvement of the site's safety culture. Consequently, the implementation and success of this program fall under the responsibility of the site director.

MESUR objectives are met when the leader and coleader interact with employees at all levels of the organization. The leader has an open dialogue with the employee on risk analysis and any specific safety requirements in the area. The leaders discuss the employee's good practices or unsafe practices by asking open questions such as, What should you pay attention to to avoid getting hurt? What parts of the body might be harmed? What could happen unexpectedly?

Once the employee has identified unsafe practices, s/he should be encouraged to find a solution. There must be immediate corrective actions that can be taken and responsibility assigned for long-term actions. The pair assist the employee to implement immediate actions. One member of the pair is responsible for the deferred actions. If the residual risk is not acceptable, temporary immediate actions must be implemented to reduce the risk level.

After the observation of a risky practice, the team plans a "MESUR minute" visit to sustain good practices, using the 5R process: repeat/repeat/repeat/recognition/refocusing. At the end of the visit, ask the employee to sum up the observations of the visit starting with the person's good practices, opportunities for improvement and agreed on action items. This has proven to be an effective program to monitor management's interventions and knowledge of risks on the factory floor as well as the perceived safety climate by the operators.

Program 2: Safety Improvement Opportunity

The Safety Improvement Opportunity (SIO) program is a simple yet effective approach to measuring the engagement and safety culture of the line-level employees at operations sites. An SIO is a suggestion, idea or perceived situation that aims to improve a certain safety and hygiene aspect on a site. Examples of this are working on an unsecured ladder, overhead work without PPE, the handling of hazardous chemicals without sufficient protection, improvement of a workstation to reduce ergonomic risks, improvement of the general maintenance of an area or a quality improvement that will lead to improved safety. This improvement opportunity reporting system must be an integral part of the safety management program at each site and must be developed around the plan-do-check-act concept.

The local management committee, after consultation with employees, must determine the most suitable management programs for a given site. For this program to be effective, management must openly encourage the reporting of safety aspects by employees (whether relating to a potential problem or an improvement proposal) and must avoid blaming anyone reporting such issues. The employees must fully understand what information must be reported and they must be aware of the importance of acting proactively to improve their own safety and that of others. Management must provide regular feedback to employees with regard to implementing the identified improvement opportunities. Lastly, a formalized system must be put in place to record, identify, monitor and conclude the actions. Site management must review the system regularly and make the necessary adjustments to improve its effectiveness.

Program 3: Validation

L'Oréal's OSH validation procedure guarantees compliance of equipment with regulations and company rules in addition to ensuring that risks are managed over time for all validated OSH equipment. This procedure concerns the equipment made available to company personnel: any machine, device or instrument assembly used to fulfill a function. This general procedure applies to all company production plants and distribution centers. In case of differences in requirements between local regulations and the rules imposed by this document, the more restrictive requirements are applied.

The validation process begins by creating a basic file in which the following must be included: the instruction manual or equivalent, design risk analysis and solutions for addressing these risks, a list of regulatory tests applying to the equipment, acceptance tests (e.g., qualification) that must be documented and the safety device maintenance program (e.g., measurement of temperature, sensors, pressure gauges, miscellaneous transducers, cleaning of flame guards and vents). In addition to the mandatory documents, the following

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items are also recommended: reports or notifications of compliance with regulatory controls (e.g., electrical, lifting, pressure), a list of all identified safety devices and their test reports, instructions and operating procedures for the equipment, workstation training material and training records. When conducting the OSH inspection on the equipment, focus on start-up, maintenance and change over, new formula, new packaging, clearing jams, cleaning and sanitization, and management of change.

The result of the OSH validation will either be a green, yellow or red validation sticker. The green sticker means that authorization is granted to operate, all residuals are accepted, operators are trained (recorded) and the validation is not to exceed 2 years. A yellow sticker allows temporary use and is a conditional validation. Temporary use and specific instructions apply to reduce the risk at an acceptable level; these must be displayed on the machine. The operator must be specifically trained. The period must not extend longer than 6 months and there is no renewal on the temporary period. If the equipment operation is forbidden, it will have a red validation sticker. The equipment cannot be placed in operation because unacceptable risks have been identified. The equipment is physically locked out. The nonconformances must be addressed and fixed and the validation can be reevaluated. All employees must be trained on the validation system so they can be held accountable for the safety of the equipment that they will operate and encounter.

Program 4: Safety Hazard Assessment

The Safety Hazard Assessment Program (SHAP) procedure is a way to assess reasonable risks and determine appropriate controls for these risks. SHAP is an essential element of the company's safety management system that provides a formalized mechanism for safety hazard assessment and offers a systematic and uniform approach for identifying and evaluating hazards and insightfully managing risks.

SHAP generates an analysis of risks based on specific hazard criteria for a specific area. General SHAP is for the entire site and detailed SHAP is for a specific activity. The use of the SHAP method is suitable in the case of physical risks such as electrical, mechanical or fire risks. Other methods must be used during the detailed assessment of the chemical risks, manufacturing process risks or health risks. SHAP analysis helps prioritize the risks that should be controlled first by a risk ranking method that analyzes the risk frequency and severity.

SHAP is a continuous improvement process and a living document. Once a SHAP analysis has been completed, it never goes away. It may be modified or added to, but it is never discarded unless the entire process leaves the site. SHAP utilizes a what-if approach to looking at a process or work area and imagining everything and anything that could go wrong. During the process, employees will discuss experiences, regulatory guidance, technical knowledge and problems that may occur. SHAP methodology follows a six-step process with a cross-functional team that works to understand the processes, identify the risks, evaluate the hazards, determine the risk (risk ranking), control the risk, and document and monitor SHAP.

The procedure for identifying hazards is structured to progressively build a refined list of hazards. The team conducts a brainstorming session, performs a facility walkthrough (entire facility for general SHAPs, specific processes for detailed SHAPs), reviews documentation for additional information (e.g., internal company OSH documents, governmental regulations, engineering diagrams, operational, safety and environmental procedures) and performs a systems functional review. Once a list of hazards is established, the team will risk rank them based on the severity and probability of occurrences, utilizing the charts provided. Once the risks are ranked, the team will determine the action plan timing based on the chart. This will all be detailed on the SHAP document.

Program 5: Powered Industrial Truck

L'Oréal's Powered Industrial Truck (PIT) program has elements of OSHA's 1910.178, however, the program is much more stringent with its unique specifications. The PIT golden rules include the following:

- pedestrians must stay inside guard railing or marked walkways;
- each site is responsible for creating a walkway or path for employees or visitors so they are protected from PITs;
- all pedestrians must wear high-visibility clothing when outside the guard railing and walkways;
- pedestrians and PITs must both stop at all designated crossings and make eye contact before proceeding;
- pedestrians must be 16 ft from a moving PIT;
- PITs must be neutralized before allowing a pedestrian to come within 4 ft.

If these rules are not followed, employees are given disciplinary action, as this is viewed as a serious violation.

Other examples of nuances to L'Oréal's program include prohibiting the usage of internal combustion (propane) trucks. All employees and visitors in the storage operations areas are required to wear high visibility clothing. The exits of the offices that lead onto passages that could be used must be physically protected by a barrier. Any PITs used in loading or unloading must be equipped with blue lights. All PIT speeds must be limited to 5 mph. All drivers must be medically fit (eye test/whisper test). In addition, there is a lot of training that is given to those who will drive a PIT. Not only are the drivers trained, but the direct supervisors of the PIT drivers must complete the necessary theoretical and practical training for the operation of each type of PIT under their supervision. The objective of this training is to make the direct supervisor more informed and aware of the activities and restrictions facing the operators in their charge.

Each site must complete a PIT/pedestrian SHAP. This outlines all the intersections and places where PITs and pedestrians can interact. The department managers must consider the specific risks associated with the use of PITs in all risk assessments conducted within his/her sector. S/he must also ensure that the training for employees directly reporting to him/her considers the risks associated with the use of PIT and actions to be taken in the event of an incident. **PSJ**

References

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