CREATING A SAFETY CULTURE ACTION PLAN

By April Greene and Will Brokaw

Safety culture is often informally described as "the way we do things around here" when it comes to safety practices. Essentially, safety culture is the product of shared values, beliefs, norms and organizational practices regarding working safely.

An organization's safety culture is ultimately reflected in the way safety is managed in the workplace. Strong safety cultures have a number of key attributes in common that promote responsible safety and health practices and beliefs across the organization. When these characteristics come together, everyone wins. Benefits that can be expected include:

- fewer incidents, losses and disruptions
- improved employee morale
- increased productivity
- lower workers' compensation and insurance claims
- improved compliance with OSHA regulations and state occupational safety and health programs
- improved reputation to help attract new or retain existing customers and employees
- better brand and shareholder value

Leveraging a Safety Culture Action Plan

It takes planning to build a best-in-class safety culture as well as commitment across every level of the organization. A safety culture action plan outlines the tools and strategies organizations can use to improve their existing safety culture and ensure that it is integrated with overall business goals, vision and mission. The ultimate objective of the plan is to prioritize the key attributes of a positive safety culture and ensure that those attributes are mature, well-functioning and fully integrated into the standard practices of the organization.

The safety culture action plan should serve as a guide to help elevate safety practices to the highest level, regardless of organization size or industry. Actions outlined in the plan should focus on the key attributes outlined in this article, which are consistent with OSHA's (n.d.a) recommended safety and health programs and ISO 45001:2018 for occupational health and safety management systems (OHSMS).

Leadership

Site management and leadership play key roles in ensuring that the organization has a positive safety culture. It is important to understand that anyone can be a leader, they do not necessarily need to be in management. All leaders must visibly demonstrate and communicate their commitment to safety and set examples through their actions. Employees pay attention to how leadership acts, so deeds must match words when it comes to safety every second of every day. There cannot be a different set of safety rules for company owners, C-suite employees, sales or office personnel, management and hourly staff. This sends mixed messages to employees that safety can be disregarded by those who are behind a desk. This disparity has the potential to create animosity and tension between employees at different levels of the organization as well as toward safety leadership staff who are trying to make positive changes.

Beyond their own actions, it is also the responsibility of organization leadership to ensure that employees across all levels of the organization prioritize safety. To accomplish this, leaders and managers must empower staff when it comes to safe work practices by supporting their judgment calls, showing up to safety meetings, practicing active listening, and recognizing and rewarding safe behavior whenever possible.

Values

An organization's values are the fundamental principles and beliefs that guide decision-making, actions and overall culture. Safety should be a recognized core organizational value in any best-in-class safety culture. Organizational policy should clearly communicate that safety is as important as productivity, profitability, quality and customer satisfaction. The decisions made by top management within the organization should reflect the organizational policy to show that actions are just as important as words. Like other organizational values, the commitment to safety must be reinforced whenever possible, integrating safety into meetings, business decisions, contractor selection, purchasing, equipment design, training, performance reviews and other changes made within the organization.

Goals, Policies & Initiatives

While an organization should seek to keep every employee safe and healthy every day, setting a goal of zero injuries

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BUILDING A STRONGER SAFETY CULTURE

- **Train supervisors with purpose.** Provide continuous, safety-specific training to frontline leaders that emphasizes genuine care, consistent follow-through and effective use of safety system tools.
- **Show safety through action.** Regularly conduct proactive, nonpunitive safety inspections with visible participation from supervisors and managers, engaging employees directly in the process.
- **Respond quickly and visibly.** Treat employee safety concerns with the same urgency as incidents, involve workers in selecting solutions and confirm effectiveness after controls are applied.
- **Empower worker ownership of safety.** Give workers co-ownership of safety processes through committees, hazard identification, stop-work authority and involvement in policy or equipment design.
- **Recognize meaningful contributions.** Acknowledge and reward employees who suggest improvements or identify hazards, focusing recognition on proactive behaviors rather than lagging indicators.
- **Lead from the top.** Ensure that executives and senior managers actively participate in safety activities such as inspections, committees and training to demonstrate authentic commitment.

can backfire by giving employees an incentive to not report unsafe behaviors and practices. Rather, goals should focus on improving safety and health and encouraging positive behaviors and practices. Goals should be realistic, measurable and actionable. To accomplish goals, it is vital that the organization assign tasks and responsibilities, establish timeframes, determine resource needs and hold people accountable.

Hand-in-hand with leadership, values and goals, organizations should have written safety policies that reinforce the organization's commitment to ensuring a safe and hazard-free environment and outline the responsibilities of each employee for conducting work in a safe manner that aligns with regulatory and compliance obligations. Safety policies, plans, programs, initiatives, and documents should be reviewed and updated on a regular schedule to ensure that they accurately reflect operations. This is a prime opportunity to engage employees from all types of jobs and at various levels, as these are the individuals who are responsible for following appropriate safety procedures, planning work activities, and upholding the safety culture using adequate risk assessment and good judgment. Importantly, engaging workers in creating and updating safety documentation creates a sense of ownership that can then be leveraged to assist with implementation, because safety programs, policies and plans are only effective if they are properly implemented.

Organization & Structure

To make safety a priority, safety should have a seat at the table. Many companies tuck safety under human resources, but this is not ideal. Safety personnel should report directly to top management. This reporting structure elevates the importance of safety and offers a powerful demonstration of management's commitment to creating a workplace that values safety.

The safety department itself may be centralized, decentralized or both. Centralized safety departments function at the corporate level. These departments generally establish overarching policies and standards to guide the organization and provide resources to other locations. Decentralized departments leverage local safety personnel who play an important role in implementing safety policies or plans at the facility level. In addition, safety committees should be part of the organizational structure as a way to engage more employees and create a sense of ownership for the overall organizational safety culture.

Employee Engagement

Engaging workers at all levels in establishing, implementing, evaluating, and improving safety and health in the workplace creates buy-in. Every employee brings something to the table when it comes to safety. New employees offer a fresh set of eyes, while long-term employees have valuable lessons learned to share. Organizations must continually provide opportunities to engage all employees in safety in meaningful and appropriate ways.

Behavior-based safety (BBS) is a proactive approach to workplace safety that is built on employee engagement. BBS relies on employees to identify, observe and address unsafe behaviors. Employees observe each other and evaluate their own safety behaviors. This encourages and normalizes intervening when an employee sees someone else such as a colleague, contractor, visitor or manager acting unsafely. While useful, BBS should be part of a more comprehensive approach to safety that considers not only the role of worker behavior in workplace safety, but also the entire OHSMS as well as the other attributes of a best-in-class safety culture.

Many opportunities exist to seek employee input and encourage employee participation in safety initiatives:

- Safety committees enhance employee understanding of safety and involve participants in important safety decisions. Committee members often become safety champions in the organization even after their terms have ended. Rotating membership allows different employees to serve in this role, learn more about safety and become organizational safety leaders.
- Employees should be involved in developing and reviewing procedures, plans and hazard assessments to ensure that they reflect the work performed and the safety practices followed and are properly implemented throughout the organization.
- Frontline employees can offer valuable insights into incident investigations, including identifying potential root causes and effective corrective actions to help prevent recurrence.
- Employees should lead safety meetings or toolbox talks, not just managers and supervisors. Assigning a topic to an employee facilitates deeper understanding and encourages greater buy-in.
- Encourage employees to gain additional safety skills by taking safety courses, attending webinars and working toward certifications. Investing in these professional development opportunities promotes employee growth and commitment to safety and strengthens organizational culture on many levels.

Resource Allocation

One important way management communicates organizational priorities involves how they choose to spend money

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and allocate resources. Budgeting for appropriate safety equipment, training, maintenance and housekeeping communicates that safety is important. Equally important, management must allocate time—both their own time and the time for workers to fully participate in safety initiatives and training. Employees should feel supported in the time they devote to personal and organizational safety.

Organizations should also be aware of outside resources they can leverage to support safety initiatives. OSHA, NIOSH, National Safety Council, ASSP, industry-specific associations, private insurance carriers, state-specific programs, and consultants may have resources available to help organizations who are looking for assistance with anything from compliance questions to monetary grants for proposed or completed safety initiatives.

Systems, Standards & Processes

Consistency is an important factor in safety. Inconsistent expectations and actions lead to inconsistent behaviors. Ambiguity in messaging and instructions can further cause safety and health hazards. Implementing systems, standards, and processes encourages consistent and repeatable operations and helps to eliminate safety risks. Consistency further removes questions and confusion for employees about what they should be doing to ensure their own safety and the safety of those around them. Examples include:

•The 6S method is an extension of the 5S methodology used to ensure that safety is a part of all lean manufacturing processes from beginning to end, helping to consistently reduce the risk of incidents while limiting production downtime. The 6S method is built on the 5S key tenets of sort, straighten, shine, standardize and sustain, with the addition of safety.

•Standard operating procedures describe the optimal method to consistently carry out work tasks. Safety information (e.g., methods of control used to mitigate the hazards associated with carrying out the steps of procedures) should be part of these documents to provide employees with a better understanding of why the mitigation measures are in place.

•Management systems help to identify and manage safety risks by implementing an organized and consistent set of policies, procedures, practices and resources that guide the organization and its activities. Implementing an OHSMS can help

organizations identify new or changing situations that might become hazardous due to complacency and then make adjustments and improvements to positively impact safety performance.

•Job safety analyses identify potential hazards associated with specific jobs or tasks and associated ways to consistently control them. As a best practice, organizations should consider combining these with PPE assessments and obtaining input from workers performing the jobs and tasks to better understand the likelihood and severity of the risks and hazards identified.

Performance Management

Organizations with successful, positive safety cultures focus on rewarding rather than disciplining employees where possible to encourage positive behavior throughout the organization. Desired behaviors and actions should be encouraged and rewarded, and safe behaviors should be folded into performance reviews. Setting a goal of zero incidents is generally not a good method as this may encourage underreporting. Instead, look for positive behaviors to reward such as near-miss reporting, safety training completion, number of safety inspections conducted, observations where coworkers assist each other to make work safer, or number of toolbox talks conducted.

Different ways to reward employees who take active roles in promoting a positive safety culture might include recognizing staff with safety awards, identifying and promoting safety champions, sending handwritten notes of appreciation from safety personnel and top management, providing tangible rewards (e.g., gift certificates), or featuring employees in safety spotlights in organizational communications (e.g., newsletter, bulletin board, intranet site).

Metrics & Reporting

What gets measured gets managed and, ideally, improved. Organizations should have measurable goals related to safety. However, identifying metrics and measuring and reporting on performance can be challenging in safety. Creativity is critical in determining appropriate metrics that provide worthwhile, useful and actionable information.

Most organizations report on lagging indicators. These describe what happened in the past and, subsequently, can lead to a culture where actions are reactive. For example, the number of injuries

at an organization within a given timeframe is a common lagging indicator. This example captures past performance once the damage has already been done. Lagging indicators do not always tell the whole story, as these statistics can be manipulated by circumstances, such as failing to report incidents or injuries in a timely manner, improperly reporting, inaccurately reporting or not reporting at all. These situations are more likely in organizations that reward zero incidents or injuries. The focus for lagging metrics should be to use the data to potentially adjust behaviors and prevent future incidents—in other words, learning from the past.

Conversely, leading indicators describe what is happening now and identify factors or situations that could potentially lead to future noncompliance or incidents (e.g., corrective and preventive maintenance completion, audit findings, safety observations). According to OSHA, leading indicators "are proactive and preventive measures that can shed light about the effectiveness of safety and health activities and reveal potential problems in a safety and health program" (OSHA, n.d.b). Leading indicators help to shift organizations from a reactive mindset to a proactive one. They rely on a commitment to safety from all levels of the organization through worker participation in program activities, timely completion of safety training, identification of preventive actions or recommendations, completion of corrective and preventive actions, and appropriate change management. Having a balance of leading and lagging indicators offers a more complete picture of overall safety performance.

Verification & Audit

Every safety program must be regularly reviewed and assessed to verify that it is meeting organizational goals and compliance requirements, as well as to identify opportunities for continual improvement. This can be done through several means, such as safety culture assessments, audits and certification programs.

A safety culture assessment entails evaluating the organization's attitudes, behaviors and practices regarding safety to identify strengths and areas for improvement. This can be accomplished by administering a safety culture survey, conducting interviews of key leadership and safety personnel, or leading focus groups with frontline employees and supervisors. The mix of quantitative data

(e.g., surveys) and qualitative information (e.g., interviews and focus groups) provides data that can be statistically analyzed as well as a rich context for the results of the statistical analysis. The first safety culture survey performed by an organization should provide a baseline for safety leaders to identify where to focus improvement efforts and to compare with future survey results. Over time, the safety survey helps determine whether improvement efforts have been effective and have fully permeated all levels and units of the organization. The safety survey should evolve as the organization moves through its safety culture journey by soliciting information from workers that leads to actionable steps.

Audits are critical for ensuring that the organization upholds standards (internal or external) and continually improves performance. Audits are intended to verify conformance with the standard or requirement, verify implementation of stated procedures, and evaluate overall effectiveness. Audits also help to uncover concerns before they become violations, determine root causes of ongoing issues and identify areas where best practices can be implemented to further protect the organization. Several types of audits exist, including:

• Internal audits are conducted by the organization itself or a contracted party acting on the company's behalf. These audits can help uncover issues and resolve them before an external audit begins or as a continual system wellness check.

• Second-party audits are conducted by a customer or client to verify compliance with contractual obligations or prior to doing business with an organization to ensure it aligns with their own objectives, values, and missions. These audits can help combat risks.

• Third-party audits are performed by an independent organization to assess compliance with industry standards and regulations. A third-party safety audit can provide a valuable means of supporting ongoing safety performance and compliance, even beyond what an internal audit might offer, by providing an objective assessment of the program.

In addition, there are many voluntary certifications, standards and programs in which best-in-class organizations may choose to participate, such as:

• ISO 45001 and ANSI Z10 are widely recognized frameworks for creating an OHSMS, which is designed to identify and manage safety risks through an organized set of policies, procedures, practices and resources that guide the enterprise and its activities to maximize business value.

• OSHA's Voluntary Protection Programs (**www.osha.gov/vpp**) recognize organizations that have implemented effective OHSMSs and maintain injury and illness rates below national Bureau of Labor Statistics averages for their respective industries.

• State programs (**www.osha.gov/stateplans**) are OSHA-approved occupational EHS programs operated by individual states or U.S. territories. Currently, 22 state plans cover both private sector and state and local government workers. These plans are monitored by OSHA and must be at least as effective as OSHA in protecting workers and in preventing work-related injuries, illnesses and deaths.

Continual Learning & Improvement

A hallmark of any best-in-class organization is its ability to continually look for opportunities to improve. Safety is no exception. Continual improvement does not necessarily mean erratic change. Rather, change should be sustainable, and that happens best when it is introduced and implemented incrementally. Small changes can lead to big differences with the right plan in place. Thinking big but acting small can help generate buy-in across the organization, consume fewer resources and create small wins more quickly to drive momentum toward reaching the big goal.

Continual improvement can take many forms. It might mean taking prompt action to correct a problem and prevent its reoccurrence, offering new professional development opportunities that involve safety, discussing audit results and corrective actions at meetings, conducting incident investigations as a group and sharing lessons learned, or providing cross-training opportunities. A continually learning organization is one that will continually improve.

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Simple Changes for Big Improvements

Committing to improving an organization's safety culture can be a daunting prospect. There are dozens of ways to make improvements to all the aspects of safety culture identified in this article, but they do not need to be implemented all at once. A safety culture action plan should outline steps to implement changes progressively, beginning with simpler changes that offer the potential for large improvements. Creating an effective action plan requires considering existing culture and honestly assessing which changes are reasonable to implement first. Every journey begins with the first step. **PSJ**

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