

Creating and Implementing a Strong Safety Culture

Many companies, particularly small, specialty trade contracting companies, know they need help with their organization's safety and health management system (SHMS), but they don't know where to start. This article is designed to provide simple, but necessary steps to take to create, implement, and maintain a compliant safety program.

Every organization falls somewhere along the "safety spectrum". Some have nothing in place for a SHMS, and some are fully compliant, experience little to no accidents or injuries, and win safety awards. Most lie somewhere in between.

The first step in creating your organization's system is to do a thorough S.W.O.T. analysis of the organization as a whole. Identify the company's Strengths, Weaknesses, Opportunities, and Threats when it comes to safety behaviors, attitudes (starting with the company management), procedures, policies, competitors, regulatory & industry agencies' (OSHA, NFPA, NEC, ANSI) standards for your trade work, and company OSHA record. You need to get an accurate "big picture" of what is really going on in the field, and in the office. Get onsite, study your employees' work processes and behaviors, as well as your foremen or superintendent's leadership in this area. Review your organization's safety and health manual. Do you have policies in place for safe work procedures that are based on OSHA's standards guidelines? Do you have an enforcement policy in place? If you do have any of these systems already in place, are you actually following them? What is the company doing for training? Is training being documented? This stage should simply be observational, and should not be used for discipline (unless there is very unsafe behavior observed. This should always be stopped and dealt with). This should be observational in nature only, gathering information for implementation of a proper system.

Once you feel you have a good understanding of where the company is at with regards to safety and compliance, you have the information necessary to begin creating policies and procedures which will be the basis for your SHMS.

Once the S.W.O.T. analysis is complete, you should have identified areas of weakness to focus on improving, and strengths to build on. Don't be discouraged if, after a thorough analysis, you realize you don't really have a safety program at all. That is not uncommon, especially for smaller trade contractors. The positive thing about this realization is just that; the recognition. You cannot change a problem that you do not even know exists. If you are doing well in some areas, but not so well in others, you have an idea of what you need to focus on.

To begin, you should take the Safety & Health Management Guidelines (SHMG) that OSHA requires organizations to have in place, and start creating policies that will bring your organization to this level of performance. OSHA has step by step guidelines you can access by clicking [here](#). These guidelines, in addition to your S.W.O.T. analysis, will show you where the company is lacking so you can create policies and procedures that will bring the company up to

par. As you begin, keep in mind that *policies and procedures are part of quality control, so these should be things that are of a routine nature, or expected repeat performance, that will bring consistent results*. While policies and procedures are routine in nature, they do not speak to the culture that you want to create, which is one of complete buy-in. However, over time, that culture will naturally develop out of the expected and enforced policies that the organization adopts, enforces, and trains employees on. The company culture is a natural by-product and response to the newly developed safety protocols that the company embraces. Be patient. It takes time.

Now that you have identified organizational strengths and weaknesses, and have created safety policies, procedures, and standards to be implemented within the company's practices, it is imperative to communicate these clearly to all employees. I would suggest holding a company-wide safety meeting, and make it fun. Have a pizza party, have some door prizes for desirable items, show some funny videos along with some for shock value (I'm a fan of shock value because it is very effective when it comes to generating safety buy-in). Then have company leadership speak from the heart to all employees regarding the creation of a new safety program, and most importantly, "why" the company is doing so. It is for them! To ensure each and every employee returns home to his/her family safely every evening. This form of communication does MUCH to elicit emotional buy-in from employees, because they feel the company genuinely cares about them. It is very important to explain the new program to employees (in their own native language, if different from English). It is management's job to clearly communicate expectations, requirements, new requirements, policies, procedures, and disciplinary measures that WILL be taken if the new program is not adhered to. It is not fair to employees to begin enforcing a program that they do not clearly understand.

From there, training is imperative! The organization must train employees on all work tasks, as well as new procedures to be implemented. If employees do not receive training on these new policies, they will not implement them properly.

Lastly, there must be a disciplinary policy in place to deal with non-compliance. This is the most difficult aspect of a safety program for managers to embrace, but it is a critically important part of an effective safety program. The best of all programs will fail without this component. In fact, OSHA considers a safety program to be ineffective and non-compliant with the new Safety and Health Management Guidelines (SHMG) if there is no enforcement.

An effective enforcement program is a ladder-program, one in which employees are given fair warning, re-training if necessary, and a chance to get it right, before termination. It is important to document every disciplinary action necessary however, even if it is a verbal warning. Without documentation of enforcement actions taken, OSHA considers there to be none, and will cite as such. This is one reason I work very hard with clients to ensure there is always a record of disciplinary action taken for *every* safety violation that has been noted. OSHA does look very carefully for enforcement actions when deciding on how severe the violation types and associated penalties will be, when reviewing inspection appeals. If the company has a good

record, a strong safety program, and good documentation of training and enforcement actions, OSHA will issue a lesser violation type (willful, serious, other-than-serious, repeat) and a smaller penalty.

Don't be discouraged if after implementation of your new safety program, you do not see results right away, or if things seem to get worse! This is normal, as there is typically a small group who will resist. Unfortunately, this group is typically your most experienced employees who have been doing their job the same way for 20-30+ years. Most people do not like change, and you must be prepared to lose a couple of employees along the way. It is inevitable. The good news is that you are taking steps forward to eliminate the sources of risk to your company, because the employees who will not work safely and/or compliantly, are a huge risk to your company, from both safety and compliance standpoints! I frequently encourage clients at this stage that this is part of cleaning house, and reducing liabilities and risk. This is a huge step in the right direction for any company that is serious about creating a strong safety culture, and a stellar safety record. Stay focused on the goals, and you'll get there! After a year or so, you will look back at where you started and be amazed. With consistency, the wheels will be rolling effortlessly after 2 years, and you will only need to tweak, maintain, and update your program. Of course, remain on guard against complacency at this point, and apply Total Quality Management principles to your safety program to keep it fresh and relevant. Feel free to contact me for more help or advice at tammy@tammykclark.com. I will upload the entire series, the OSHA SHMG, and additional resources to the Safety & Health Awareness Committee page for your reference.

Congratulations for taking the first step! And remember that consistency is key! *Consistently safe work practices deliver consistently safe and compliant outcomes.*