Compliance or Injury Prevention
(how do you choose)

Gary A. Higbee EMBA CSP
Compliance or Injury Prevention

• Supposed to be the same...
Five Stages to World Class Safety ©

1. **Realization**
   - We need to do something!

2. **Traditional**
   - Establish policies/procedures
   - Rules and regulations
   - Legalistic compliance
   - Activity based
   - MBO

3. **Observation**
   - Behavior based
   - Compliance driven
   - Little employee involvement

4. **Empowerment**
   - Behavior based
   - Employee empowered
   - Team concepts
   - Group focused goals
   - (Peer to Peer)

5. **Utopia**
   - Happens naturally
   - Employee driven

Cultural Change
Observational Safety

• Been Around for Over 30 Years
  – STOP (Management to Employee)
  – BST (Peer to Peer)
  – SafeTrack (Primarily Peer to Peer)
  – beeSafe (Both)

• Grew out of our Failure
  – Supervisor Issues
  – Worker Issues
Observation Based Safety Program Steps

- Plan to Observe
- Observe Using a Checklist of Critical Behaviors
- Positive Reinforcement and Feedback (not natural)
- Intervene and Feedback
  - Support Development of “Habit Strength”
- Reporting and Tracking Observations
- Analyzing Data and Making Recommendation
Change of Thought 1996
(The Problem)

- The Forklift Operator (An Ah Ha Moment)
  - Habit Strength can take a long time to develop
  - Habit Strength can be lost quickly
  - Stress or Stressors Influence Risk Taking
  - Some settings are not suited for the Observation Process
  - Deal with the whole Problem – Work, Home & Road
3 Attributes to World Class Safety ©

- Advanced Safety Skills & Awareness Training
- Employee Responsibility
- Observational Safety
- Traditional Safety (Regulatory Compliance SMS)

Optimum Integration Into The Process
Compliance or Injury Prevention

- Supposed to be the same…(not always)

- Injury Prevention Initiatives and activities (reductions greater than 40%) have real ROI. Compliance in time (usually) just minimizes liability.

- Compliance only works on the job, doesn’t prevent off the job injuries or motor vehicle incidents and fatalities.

- How much of your time is spent on Compliance?
Compliance vs. Injury Prevention

• How much of your time is spent on Compliance? Vs. Injury Prevention (Awareness training)
  • Less than 50%
  • 50-65%
  • 65-80%
  • More than 80%
Traditional Safety
Exclusively Related to Work
(Regulatory Compliance SMS Leadership)

- Engineering
- Supervision
- Inspections
- Audits
- Training
- Recordkeeping
- Discipline
- Safety Committees
- JHA/JSA
- Procedures
- Policies
- Programs
Compliance or Injury Prevention

• Assess the Organization
  – Where are we today
  – Where are we going if nothing changes
  – Where do we want or need to go
  – Annual assessments (Corporate, Internal, External)
    • Administrative & Operational

• Target the Gaps and looking for Risk
  – Risk: Health & Safety, Regulatory and Excess Liability
  – Create an annual action plan
    • Set goals
    • Assign responsibilities
The Annual Safety Plan

• Focus on how to address issues of lower performance discovered during the annual assessment.
  – Prioritize by Risk Categories (Injury & Legal Liability)
    • High Probability High Severity
    • Low Probability High Severity
    • High Probability Low Severity
    • Low Probability Low Severity

• A very detailed plan should be developed. You would also provide an executive summary for wage employees and part of the management group.

• Spreadsheet of activities and responsibilities

Safety Management System
Compliance vs. Injury Prevention

• Where do most accidental injuries and fatalities occur? (not at work)
• What really causes most injuries? (Rushing, Frustration, Fatigue and Complacency…)
• How much do off the job injuries cost?
• How much does accidental equipment damage and the related downtime cost? (more than on the job)
• What can you do to really reduce injuries significantly? (external vs. internal)
UNINTENTIONAL DEATHS IN CANADA AND USA (5-year average)

- At work: 5,500
- At home: 47,000
- On the road: 50,000
- In the community: 33,000
- Medical mistakes: 98,000 (estimate)
Off vs. On-the-Job Injuries – 3:1

Source: Injury Facts, 2009 Ed.
Compliance vs. Injury Prevention

• Where do most accidental injuries and fatalities occur? (not at work)
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• How much do off the job injuries cost?
• How much does accidental equipment damage and the related downtime cost? (more than on the job)
• What can you do to really reduce injuries significantly? (external vs. internal)
These four states...
- Rushing
- Frustration
- Fatigue
- Complacency

can cause or contribute to these critical errors ...
- Eyes not on Task
- Mind not on Task
- Line-of-Fire
- Balance/Traction/Grip

...which increase the risk of injury.
Knowing About the SafeStart Injury Risk Pattern is Only the Beginning

States (Cause) Errors (Which cause) Less risk (To become) More risk

- Rushing
- Frustration
- Fatigue
- Complacency
- Eyes Not on Task
- Mind not on task
- Line of fire
- Balance, Traction, Grip

Hazards

To Become

Hazards with a critical error
Compliance vs. Injury Prevention

- Where do most accidental injuries and fatalities occur? *(not at work)*
- What really causes most injuries? *(Rushing, Frustration, Fatigue and Complacency…)*
- How much do off the job injuries cost?
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- What can you do to really reduce injuries significantly? *(external vs. internal)*
Employer Costs per Employee Family

- Occupational injuries – $2,000
- Off-the-job injuries to employee – $800
- Injuries to employee’s family members – reasonable low estimate at $800
- Total on-the-job and off-the-job – $3,600
- Accidental equipment damage/downtime (% x $2000)
- Total cost: $4000 – $6000 per employee (family) per year
Compliance vs. Injury Prevention

• Where do most accidental injuries and fatalities occur? (not at work)
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Compliance vs. Injury Prevention

• “When you have reached a point where analysis of your injury, audit and inspection data no longer discovers meaningful trends it is time to include human factors as part of your research” Larry Wilson
Compliance vs. Injury Prevention

• “There comes a point where compliance and injury reduction split. Where better compliance may not further reduce injuries”

Gary A. Higbee 1998
Compliance or Injury Prevention

• Supposed to be the same…(not always)
• Not everyone is interested in compliance.
  – Standing on a chair
  – Speeding
• But everyone is interested in injury prevention. (not getting hurt)
STOP + THINK! THINK SAFETY
3 Attributes to World Class Safety ©

Advanced Safety Skills & Awareness Training
Employee Responsibility

Observational Safety
Traditional Safety
(Regulatory Compliance SMS)

Optimum Integration Into The Process
Hazardous Energy  
Person  
Unexpected
Sources of Unexpected

Self - own actions cause or contribute to incident/injury

Other People - someone else’s behavior causes or contributes to incident/injury.

Equipment - something unexpected happens without you or someone else involved (e.g. wire rope breaks, traffic lights start working incorrectly, coupling fails, hose bursts, etc.)
Knowing About the SafeStart Injury Risk Pattern is Only the Beginning

States (Cause) Errors (Which cause) Less risk (To become) More risk

- Rushing
- Frustration
- Fatigue
- Complacency
- Eyes Not on Task
- Mind not on task
- Line of fire
- Balance, Traction, Grip

Hazards

- Major
- Minor
- Close Calls

Hazards with a critical error

making our world safer
SAFE Start™

Critical Error Reduction Techniques (CERT)

1. Self-trigger on the state (or amount of hazardous energy) so you don’t make a critical error

2. Analyze close calls and small errors (to prevent agonizing over big ones)

3. Look at others for the patterns that increase the risk of injury

4. Work on habits

States ➔ Errors ➔ Less Risk ➔ More Risk

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Analyzing Close Calls & Errors

**SAFESTART™**

Critical Error Reduction Techniques (CERT)

1. **Self-trigger on the state (or amount of hazardous energy) so you don’t make a critical error**

2. **Analyze close calls and small errors (to prevent agonizing over big ones)**

3. **Look at others for the patterns that increase the risk of injury**

4. **Work on habits**

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**SAFESTART™**

These four states...

- Rushing
- Frustration
- Fatigue
- Complacency

...which can cause or contribute to these critical errors...

- Eyes not on Task
- Mind not on Task
- Line-of-Fire
- Balance/Traction/Grip

...which increase the risk of injury.

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Unit #5 – SafeStart Home

4 DVDs for your family

8000 children die accidentally in Canada and the U.S.A. every year.

Leading cause of death (1-44)

More potential years lost than heart attacks, stroke, diabetes, Aids/HIV and cancer combined

Approximately one child per hour
3 Attributes to World Class Safety ©

- Advanced Safety Skills & Awareness Training
- Observational Safety
- Traditional Safety (Regulatory Compliance SMS)

Optimum Integration Into The Process
Managing Complex Change

Change → Confusion

Confusion → Anxiety

Anxiety → Gradual Change

Gradual Change → Frustration

Frustration → False Starts

Vision → Skills → Incentives → Resources → Action Plan