

The top ten mistakes organisations make when implementing health and safety

(And how to avoid them all)





Introduction

Hi, my name is Malcolm Tullett, director of Risk and Safety Plus. We enable organisations to proactively manage their risk and safety obligations in a way that supports their business.

If you are reading this document, I am guessing that you may have a problem with health and safety within your business. I imagine that you care about your staff and you are seeking ideas on how to change the way your organisation manages health and safety in a way that benefits your business.

In this guide, I will outline some of the biggest mistakes we come across that cause organisations to feel anxious when it comes to risk management. This is not an exhaustive list, but these mistakes are ones that we encounter every day when we engage with new clients. The good news is that they are all totally avoidable and with a little focused effort, you can ensure that health and safety works in a way that benefits your business, rather than it being a burden.

As I take you through the mistakes, I will use the abbreviation SHEF, which stands for Safety, Health, Environment and Fire. This is our preferred term for risk management and occupational safety, because fire and environmental issues are two parts of the overall jigsaw that are often overlooked.

As a company, Risk and Safety Plus (RS+) specialises in the property development and construction sectors where the risks are acute and the environment is an important consideration when keeping people safe. We also include fire because it is often treated separately and, in our experience, inadequately. Yet, for a business, fire can be the most significant and devastating of all the risks.

After reading this guide, you should develop a clear understanding of how to progress from the normal cookie cutter approach to risk and safety, to being able to find a recipe for your organisation that not only keeps people safe, but is good for business too.

Anyway, I hope this guide gets you thinking about what you could do differently in your organisation to make it a safer place for all.

Best wishes,



Malcolm Tullett
Director, Risk and Safety Plus Ltd



Mistake #1 – Lack of adequate planning

The mistake

Inadequate planning is a common SHEF mistake for all organisations, especially those in the property development and construction sectors where there is a statutory duty for planning on construction projects. Companies often duplicate the documents previously used for other property developments, or even from other companies, and cobble something together just so they can demonstrate that they are complying with regulations. These documents are often used over and over again, but are rarely read by the people they are intended to protect.

The problem comes when the risks are copied as a checklist, rather than the property development managers starting afresh and reviewing all of the possible risks. For example, the source documents may contain information relevant to a housing development project, which wouldn't necessarily be relevant to a project that deals with watercourses. In this case, potential risks may be overlooked or omitted, which can have tragic consequences.

Inadequate planning also comes to light when changes occur that impact the original plans. For example, the original building plans may contain details of a 50-meter long, straight brick wall, but then a variation notice comes in to build a zigzag wall instead. This means that the original plans are no longer applicable, but the project manager fails to conduct a new risk analysis to suit the modified plan. The result is that a worker ends up unwittingly cutting through a buried power cable and getting electrocuted, because the plans are no longer accurate.

The consequences

Lack of adequate planning often results in accidents that could easily be avoided. Risks can get overlooked and as a consequence, the organisation operates with a false sense of security until something serious happens and then everyone questions why the obvious risks were overlooked. Ultimately, this can have a detrimental impact on the organisation's finances and their reputation.

How to avoid it

Avoiding this mistake requires the company to embrace the dynamic management of risk. Planning should start from a blank sheet and practices and procedures should be put in place so that risks can be reassessed dynamically as day-to-day changes occur. Planning should, therefore, be seen as a continuous process rather than a one-off exercise that's done to demonstrate compliance. It's about embedding it into the company psyche to continually consider what could go wrong and adopt a 'don't walk by' attitude. It's always better to think, 'what if', rather than, 'if only'.

The planning can't just be completed centrally. Organisations should produce generic risk assessments, but middle managers should conduct specific assessments too and have the authority to override the generic assessment where necessary. Workers should be trained to keep their eyes, ears and all other senses open in order to stay safe. Humans are designed to conduct continuous risk assessment, so it is a case of getting back to our human instincts.



Mistake #2 – Tick-box approach to compliance

The mistake

The duty of care associated with SHEF regulations only encourages you to tick boxes rather than actually care about your staff. Organisations that make this mistake will be constantly checking to ensure that all the required tasks have been completed. They will want to be compliant and in order to ensure that happens, will devise systems to make sure that all employees comply. The issue with this is that tick boxes are about completing tasks and demonstrating that you have fulfilled a duty of care, rather than being about actually caring.

It is a little bit like a parent getting their child up in the morning and ready for school. They have a routine and they want to make sure the routine is followed, so they go into their son's bedroom and say, "Wake up son", and then tick a box on their clipboard to cross off the task. The next task is to get the child dressed and so on, until they are ready for school. They become so focused on their checklist that they fail to notice that their child's shoelaces are undone!

The consequences

A compliant company that ticks all the boxes can still be dangerous. Incidents can easily happen because people become too focused on the process of ticking boxes, rather than looking out for safety issues and thinking outside of the box. Moreover, staff may manipulate the truth so that they can simply complete the checklist.



How to avoid it

Rather than giving people boxes to tick, you should be giving them things to look for. For example, if you are getting people to do a walk around, instruct them on what to look out for so that the only box they need to tick is that they have walked around. They should also be instructed to keep their eyes, ears, and senses open to what can go wrong. Then, when they do spot something there needs to be the mechanism in place for providing feedback and having that feedback acted upon.

Avoiding this mistake requires a change of attitude at the top of the organisation so that a proactive approach can be taken to avoid accidents and create a safe environment for staff. The managers need to embrace safety as a core value, but this change will require strong leadership and effective communication at all levels in the organisation to create a culture that will support this new proactive approach.



Mistake #3 – Focusing on the paperwork

The mistake

It is fair to say that health and safety comes with a fair amount of paperwork, and it is easy to fall into the trap of focusing on paperwork instead of the systems and processes that lead to a safe working environment. If you don't have a safety policy along with the associated procedural documents, the task of setting it all up can seem more than a little daunting. It is very tempting to dive straight into the paperwork and start creating the documents with a 'copy and paste' attitude, rather than taking the time to understand what they should include.



When doing SHEF properly, paperwork is only 10% of the battle, yet companies get so wrapped up in paper that they lose sight of the bigger picture. They end up overdoing the paperwork and creating so many documents that it becomes overwhelming, and people don't bother to read it. Paperwork is incredibly important after an incident occurs, but the paperwork itself won't prevent accidents from occurring or make the working environment any safer.

The consequences

The company leadership is left with a false sense of security. Focusing on the paperwork instead of creating a safe working environment increases the risk of incidents and accidents occurring.

When an accident happens and the directors and senior managers end up in court, the judge will want to know why the company did not implement the policies in the paperwork.

How to avoid it

50% of health and safety is about the process, and working safely in the way that people have been taught how to work. 40% is information, instruction, training, and supervision. If these things are in place, then 90% of the job is done. The remaining 10% is the paperwork that provides evidence that you have executed the other 90%, should you ever need to prove it.

If you are making the mistake of creating too much paperwork, then it will require a root and branch look at SHEF. This normally entails a shift in the mindset of the organisation's leaders, from begrudgingly conforming to regulations, to understanding that the regulations are there to create a safe workplace.

As painful as it may seem, in most cases it is easier and more cost effective to go back to the drawing board and start all over again. It involves stripping out the padding and getting down to looking at the core processes of the business and making the working practices efficient and effective in a safe environment.



Mistake #4 – Taking a reactive approach to SHEF

The mistake

Most organisations take the approach of, “If it ain’t broke, don’t fix it”. They implement their SHEF policies, often accompanied by a mountain of paperwork, which they can’t enforce because there is too much management required with this system to achieve compliance. They believe that they have everything covered and issue the policies along with appropriate training. The problem is that they are very reluctant to make changes until they get a near miss (which often go unreported), an incident, or something worse.

When something does happen, there is a knee-jerk reaction and a mad panic to ensure that all the paperwork has been completed to prevent a possible claim, which may even involve editing policies and procedures. Once changed, the company then will then go back to the status quo of assuming that everything is OK, until the next time a problem occurs and the process is repeated all over again.

This is effectively closing the stable door after the horse has bolted. Management energy is continually focused on dealing with the fallout and clearing up the mess rather than making sure such accidents do not happen in the first place.

The consequences

Dealing with the consequences of accidents, once they happen, tends to take up a disproportionate amount of management time. There are also the inevitable financial implications that tend to follow accidents along with damage to reputation. The one cost that is much harder to quantify is the impact on staff morale. Employees are sent a very clear message that the organisation is not concerned about their safety, particularly if they have previously voiced their concerns about the risk. From an employee perspective, management is only knee-jerking to make sure that their own backside is covered, rather than because they care about the person or the actual incident.

How to avoid it

Moving to a proactive approach to SHEF is the obvious answer, but it is easier said than done without proactive leadership from the top of the organisation. SHEF needs to be seen as a way of keeping the workforce safe rather than a set of regulations that need to be complied with. Once the focus is on avoidance rather than compliance, there is hope. In essence, the consideration should be on behaviour and the company culture being proactive rather than reactive.

This attitude will, over time, filter through the organisation to middle managers and the workforce. The organisation needs to start taking a dynamic approach to planning and risk assessment and then educate and train staff to be on the lookout and to feed back anything that currently poses a risk or could pose a risk in the future. In short, the whole organisation needs to be pulling together to make the working environment safe.

Unfortunately, this often means starting all over again so that policies and procedures are designed to support the new proactive approach to SHEF.



Mistake #5 – Poor communication

The mistake

Communication of SHEF is often handled poorly within organisations. They write a lengthy policy document and then expect everyone in the organisation to read it. Different people within an organisation have different needs that are often not accommodated for, so it is a mistake to take the communication lightly.

A one-size-fits-all approach to communication is bound to fail. Expecting all sectors of the organisation to read and digest the detail in the policy document is quite unrealistic. Staff will claim to have read the document but because so much may be irrelevant to their needs and requirements, much of it will go over their heads.

In addition to the organisation communicating SHEF policies and requirements to staff, another aspect of poor communication is the ability of staff to be able to communicate their concerns about safety related issues to the appropriate levels of management.



The consequences

Poor communication of SHEF can have a crippling effect on an organisation. If staff do not understand what they are supposed to do, they are unlikely to do what's required. Time and resources will be wasted clarifying poorly communicated policies and getting staff to comply with the requirements. There are the obvious safety implications of non-compliance and the risks to the organisation, especially if there are no communication channels between staff and management that allow staff to communicate their concerns.

How to avoid it

In terms of communication, consider all types including written, verbal, and implied communication. Instead of having a single policy document that is supposed to cover the whole organisation, there should be a matrix of information for the different levels in the organisation, spanning from director, to middle management, to worker. In short, the information should be a combination of written, verbal, and implied communication, and delivered in a way that is understandable and relevant to each specific level.

Managers need information about how SHEF impacts their managerial role on a day-to-day basis along with any reporting and accountability requirements. Workers should have really simple instructions, which could be as simple as five dos and five don'ts written on a card that they can fit into their top pocket.

In planning SHEF communication channels, make sure that communication is two-way and staff are able to feed back their concerns and feel safe to help improve the quality of the communication. There should also be consideration about how SHEF will be communicated to new employees that join the organisation once SHEF has been implemented.



Mistake #6 – Inappropriate training

The mistake

This mistake often occurs when companies are too focused on demonstrating compliance rather than taking time to truly understand the training needs of their staff. A good example is the training of Fire Marshals. An organisation needs to train Fire Marshals but assumes that the Fire Service is a good place to send staff to be trained. They do this without checking what is included in the training, so the consequence is that the Fire Marshals return to the organisation with the belief that they are responsible for fighting fires, rather than preventing fires and keeping people safe.

Inappropriate training of the use of equipment is also common. A member of staff will be trained on how to use the equipment, but will not receive training on the wider behavioural elements, such as how to ensure their own safety and the safety of others. For example, training on an angle grinder will include how to use the safety guard so that they do not lose a finger, but it may not include how to stow the angle grinder to prevent people from tripping over it.

The consequences

Public training courses are typically generic and lead to staff members either having gaps in their training, or learning information that is inappropriate to their needs. In addition, when training omits the wider behavioural aspects of SHEF, whether delivered internally or by a third-party trainer, the organisation can still be exposed to risks. It only takes one person to act without thinking about the wider consequences of their actions to cause a serious injury or fatality.

How to avoid it

Training needs to be part of an integrated programme that starts at the top and works its way down the organisation. It should include the following three elements:

-  Basic skills training on how to use equipment safely.
-  Procedures they need to follow and what they should do if there is an incident (e.g. Permit to work systems).
-  How to behave and think for themselves.

The training should include all three elements, however correct behaviour is key. It is about getting staff to think for themselves rather than blindly following their training to the letter. It is about training them to look out for hazards, even if it is outside of their skill set, and knowing what to do if they see one. Employees need to be given the bigger safety picture in any training so that they know how to behave in an appropriate manner. It is actually this behavioural element that plays a major part in keeping staff safe and stopping all preventable accidents.

However, before rushing into training, you should consider what specific training each member needs and how to put it into a personal training plan. If you are using an external trainer for elements of the training, make sure that their training is fit for purpose. These days, there are lots of low-cost training options and supervision should always be a part of the overall training mix.



Mistake # 7 – Not learning from mistakes

The mistake

Many companies experience incidents and near misses but fail to update their processes to prevent the mistake from recurring. For example, a company may have an incident and handle the reporting of the incident correctly, but they may fail to review what caused the accident in the first place or consider whether the policies and procedures need to be amended.

The problem is that they have designed their SHEF policy without including any mechanism to allow the policy and processes to evolve and improve over time. This is another symptom of an organisation that sees the goal of SHEF as issuing policy documents and demonstrating compliance rather than keeping staff and customers safe. Incidents and accidents are recorded and reported but there is no process for learning from mistakes and continually improving safety.

The consequences

An organisation that does not learn from mistakes is doomed to repeat the same mistakes along with the associated financial and human consequences. What's more, an organisation without a feedback loop will potentially have a greater number of accidents because they will miss out on the early warning signs that often precede the occurrence of an incident or accident.

How to avoid it

An important aspect of minimising the risk of incidents and accidents is to have a dynamic approach to risk assessment that includes correctly channelling and acting upon feedback. This means that when mistakes happen and unsafe acts are noticed and reported upon, the risk assessment is reviewed and adjusted accordingly. If the organisation does decide to update their risk assessment, then there will be a number of follow-on changes that will affect policies, procedures, communication, and training.

For a dynamic approach to risk assessment to be successful, there needs to be an open and honest feedback loop that allows staff to own up to mistakes so that they can ensure their colleagues do not make the same mistake again. This will take a commitment from the top of the organisation to encourage staff to engage with this dynamic approach. It also requires staff to be trained on the role they are expected to perform and a safe environment so that they can feed back without fear or favour.



Mistake #8 – Discouraging feedback

The mistake

As we have seen, feedback is essential in order to continually iron out unsafe practices. However, in many companies, whether intentional or not, staff get the message that feedback is not welcomed and therefore keep quiet when near misses or incidents occur. For example, some companies do not allow their staff to make any mistakes and when mistakes do occur, the staff are disciplined or even fired. It is easy to understand why, in that situation, staff would be reluctant to speak out and put their head above the parapet.

Particularly in the construction industry, a culture of fear is quite common. The company will publicise to staff that they have a zero tolerance policy. As a result, any mistakes that do happen are covered up. Staff and contractors keep quiet because they know that if they were to report it they would risk losing their job. Often, such companies will discipline anyone who questions their policies, let alone those who try to report an incident arising from them.

The consequences

When a company tries to control health and safety and discourage feedback, they actually lose control over SHEF. They think that their policies are working and they are in control, but, in actual fact, the opposite is true. Incidents and near misses get buried and the hazards are never addressed. Employees tell the management what they want to hear and it takes a serious incident or accident for the management to realise there is a problem.

How to avoid it

Data gives rise to information and information gives rise to knowledge, and from this wisdom is derived. Data is the first important step in becoming wise and when it comes to SHEF, the data comes from feedback. The reports that come from the data allow us to develop the knowledge, and hopefully the wisdom, to ensure that things are done properly in the future. We need people to report in order to gather the data.

The ideal scenario is to create a culture where the staff feels safe to provide feedback about processes and practices. Fatalities and serious debilitating injuries all stem from a culture of allowing bad custom and practice to continue. It is easier to create a feedback culture in the first place rather than having to change the culture once it has been embedded. Employees that have been in a situation where people have been disciplined will take some time to trust that they can now give feedback without fear of any repercussions. They will look at the management's actions rather than what they say. If you encourage feedback, you need to show that you are actually doing something with the information, especially if it does not result in a change to processes and policies.



Mistake #9 – Incentivising bad behaviours

The mistake

Monetary incentives can be effective at changing behaviours, but many companies get it wrong and unwittingly end up incentivising the wrong thing. A good example is providing a bonus to managers for zero accidents. A company will put measures in place to support the bonus, but this is where things start to go wrong. There is a temptation for the manager not to report things that are happening because it would reflect badly on their bonus. That means that you do not collect the data that, as we have already learnt, is vital to creating the dynamic feedback loop, which is essential for making ongoing improvements.

Another common mistake is that companies will set the wrong measures for their incentive scheme so they end up rewarding the wrong people. 20% of the staff will be exercising the right kind of behaviour, and 80% of the staff will not. However, because of poorly designed measures, the money will end up going to the 20% of staff who are already doing the right thing rather than incentivising the 80% of staff to start adopting the right behaviour. In short, the good staff get paid more for doing what they are already doing and the bad staff have no incentive to change.

The consequences

The obvious consequence of getting incentives wrong is the cost of paying out bonuses without seeing any real change in attitude of behaviour. There are also the financial and reputational implications of staff leading you to believe that everything is working fine, when in actual fact, the company is still just as exposed to incidents and accidents.

How to avoid it

Design your incentive payments so that they are rewarding the behaviour that you want to encourage, and that indicate progress towards your goals and objectives. For example:

-  How many safety checks have we done this month?
-  How many training courses have we done this month?
-  How many people attended?
-  What was the feedback from the training?
-  How or what did we improve as a result of the feedback? (And has the feedback improved?)

Wait until the point where at least 50% of the workforce is demonstrating the right behaviour and use it to start ramping things up so that you reach the 80% marker. Make the incentive a company-based scheme to encourage a change in the company behaviour as a whole, rather than a change in specific individuals. Incentives should reward proactive behaviour that prevents incidents and accidents from happening, rather than rewarding people on how they react. We want to encourage the behaviours that lead to proactivity and encourage a feedback culture.



Mistake #10 – Lack of defensibility

The mistake

Although companies create a lot of paperwork, they often fail to take into account the ultimate use of the paperwork they are producing. We have already covered the use of documentation to communicate policies and procedures to staff. The policies and procedures themselves need to be defensible as well as being appropriate, and there needs to be evidence that those policies and procedures have been followed.

Some organisations have policies and procedures that are totally unworkable and if actually followed, would create an unsafe environment and would not be defensible in court. Others have good policies and procedures in place, however they wouldn't be able to demonstrate that they are being followed if required in the case of a criminal or civil claim. For example, their policy statements may state something like, 'Site-specific assessments will take place for every job', but they may not be able to prove that site assessments are being conducted.



The consequences

The more paperwork a company has, the more at risk they are with the weight of procedure because a judge will want evidence to show that those procedures are appropriate and have been followed. Without documentary evidence, a company will not be able to defend a claim. This may also lead to a lower payout by insurers, increased premiums and added restrictions on their insurance policy. In some cases, insurers may not even pay out at all.

How to avoid it

Ensure that anything within your policies and procedures that states something will happen actually takes place, and that there is evidence to prove that it is happening. In short, whenever your policy statement includes terms like, 'We will...' then you need to be sure that you have the processes in place to ensure that they happen and that there is a way to record that they have happened.

For example, if your policies state, 'We will train all staff to be competent in what they are engaged to do', then make sure that you have a process to assess the appropriate training needs for each member of staff, identify the gaps and have a formal training plan in place to fill in the gaps. Make sure you can defend that the training is adequate and that each member of staff has received all the prescribed training to a satisfactory level of proficiency. The easiest way is to have a training file for each member of staff, which contains their training plan and evidence that they have attended and passed the training. Where training needs to be re-taken periodically, ensure that there is a reminder system in place to ensure that people get re-trained and there is evidence that it has happened.





Next steps

I hope that you have found this guide useful and noticed some common themes, which I would like to say a few words about.

When working with clients, the first major change occurs when they decide to take a proactive approach to managing the safety of their staff and customers. It is like flicking a switch and once the decision has been made, then what needs to be done is much clearer and complying with regulations ceases to be a burden.

The road is always much easier for organisations that start off with a proactive approach to SHEF. The easiest and least costly path is always to take a step back, get back to basics, and design your SHEF in a way that works for your organisation. The best way is one that is simple and keeps your staff and customers safe without getting wrapped up in red tape.

I hope you can see that for SHEF to work for the benefit of your organisation, all staff members need to be engaged. The involvement of the various levels of the organisation is essential, although it may be a little challenging if they have not previously formed part of the picture. Change is a specialist skill and it normally requires an external agent to facilitate the change.

If you do decide to get some help, make sure that you use a company that not only understands how to implement SHEF on a proactive basis, but that has also had experience in facilitating change in the behaviours of multiple levels of staff.

When you are ready to change, we would love to talk to you about how we can help make SHEF work for the benefit of your organisation. In the meantime, you may be interested in our free defensibility health check. It is a unique assessment and will enable you to evaluate how well your implementation of SHEF would stand up in court should an incident arise. It is easy to complete and will give you specific insights.

If you would like a copy of the defensibility health check, please email me at malcolm.tullett@riskandsafetyplus.com, and write 'Free Risk and Safety Evaluator' in the subject line.

I will also send you short and useful SHEF tips on a weekly basis and invite you to some of our exclusive webinars. If you do not find them useful then you can unsubscribe at any time.

Best wishes and good luck!



Malcolm Tullett
Director, Risk and Safety Plus Ltd





www.riskandsafetyplus.com

Telephone: 0845 430 9461

Email: info@riskandsafetyplus.com