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Evaluating management systems

A different kind of thinking

By Paul Esposito, CSP, CIH

Good management systems must be in place if safety and health are to remain a visible top priority at any site. In general, management systems include: policies, practices, facility & equipment design, training, consequences, accountability, priorities, resources, and metrics.

OSHA's guidelines

In 1989, OSHA defined health and safety management systems in the Program Management Guidelines (Federal Register Vol. 54, No. 16 1/26/89), seven years after the VPP (Voluntary Protection Program) was first implemented. These guidelines were a result of years of effort on the part of OSHA and industry personnel studying and correlating the management systems most in common with the best of the best.

Here are the basic elements:

Management commitment: Management commitment provides the motivating force and the resources for organizing and controlling activities within an organization. In an effective program, management regards workers safety and health as a fundamental value of the organization and applies its commitment to safety and health protection with as much vigor as to other organizational purposes.

Employee involvement: Employee involvement provides the means through which workers develop and/or express their own commitment to safety and health protection, for themselves and for their fellow workers. Employee involvement is actually a part of the management category. Employees will only become involved to the extent management provides opportunity and encouragement.

Worksite analysis: Worksite analysis involves a variety of examinations to identify not only existing hazards, but conditions and operations in which changes might occur to create hazards. Unawareness of a hazard that stems from failure to examine the worksite is a sure sign that safety and health policies and/or practices are ineffective. Effective management actively analyzes all work and the worksite to anticipate and prevent harmful occurrences.

Hazard prevention and control: Hazard prevention and controls are triggered by a determination that a hazard or potential hazard exists. Where feasible, hazards are prevented by effective design of the job site or job. Where this is not feasible, hazards are controlled to prevent unsafe and unhealthful exposure. Elimination or controls is accomplished in a timely manner, once a hazard or potential hazard is recognized.

Training: Training addresses the safety and health responsibilities of all personnel concerned with the site, whether salaried or hourly. It's often most effective when incorporated into other training about performance requirements and job practices. Its depth depends on the size and complexity of the worksite, and the nature of the hazards and potential hazards at the site.

Assessments

When you evaluate a management system, there is a different kind of thinking or perspective needed than when checking for compliance. Assessors need to be able to look at issues like effectiveness, process and the organizational culture to determine how a safety and health program is designed. During the assessment, the assessor asks each of the following:

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- Do safety and health programs incorporate the science of safety — not just common sense?
- Is the safety program part of existing management processes, or just an orphan program?
- Does the system facilitate employee involvement?
- Is there a plan for continuous improvement?
- Is each program metrics driven? Is prospective and retrospective data used?
- Are all commitments tracked to closure?

There are three primary components when performing an assessment: document review of procedures and activity records; interviews of employees at all levels for knowledge, awareness and perceptions; and visual observations of site conditions, leading to the discovery of hazards and the tracing of their root causes.

A subsequent report typically contains a list of the programs or systems reviewed and a narrative account of the examination of each system or program. It sometimes also contains a schedule of needed changes, with target completion dates, responsible parties, and space to indicate the date when changes are actually completed. Some reports include pictures of situations that are excellent and those that need improvement. Some provide grading systems or scoring metrics so that each year's results can quickly be compared to previous years. Some companies make these reports available to any employee who wants to read it.

More than an inspection

This process is more than an inspection or a survey. Inspections are necessary to look at the facility, the process, and the individual jobs in order to eliminate or control any hazards that may exist. Surveys focus on program activities and seek to determine whether specific objectives have been met. For example, if you are assessing employee participation by looking at the activities of the safety committee, you will want to know if the committee met at the intervals specific, and if most of the members attended each meeting. These are survey questions.

But beyond this simple accounting are larger questions — namely effectiveness. For example, has employee participation at safety committee meetings helped improve a worksite safety and health program? How is the work of the safety committee helping you meet your goal? These are the kinds of issues addressed by a management systems assessment.

The bottom line of an assessment is to identify strengths and weaknesses by asking a series of “why” questions.

For example, regulatory findings or observations are treated as symptoms of a management system or process failure. So when you ask “why” enough times of the right people, the answer to this question should tie back to a strength or weakness in one or more of the 26 management system elements identified by OSHA in its guidelines. By identifying these underlying system failures or root causes, you can develop program improvements to better control these failures.

A management systems assessment defines the current status of your program. A fundamental component of the assessment is to ensure that the proper mechanisms are in place for a program's success. A properly designed assessment will not only identify strengths and weaknesses, but quantify them as well, so meaningful corrective actions (goals and objectives) can be tracked, trended, developed and implemented.

A safety and health management systems assessment looks at the *processes* created to carry out your safety and health program. It asks if these systems are working effectively and efficiently. All systems that contribute to your safety and health program are reviewed. These should include management leadership and the evaluation of that leadership, the analysis of the worksite to identify hazards, hazard prevention and control, incident and near miss investigations, employee

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involvement, safety and health training, use of personal protection equipment, the health program, the emergency response program, and others. Each site may have additional programs or systems that contribute to the safety and health program. These are evaluated as well.

Benefits

Since being adopted as the safety and health management system by OSHA's Voluntary Protection Program (VPP), companies and sites implementing the Program Management Guidelines approach have recorded incredible successes. Overall, sites participating in the VPP experience injury and illness recordable rates averaging 60-80 percent below industry averages. Likewise, days-away case rates improve 50-60 percent within a few years.

Implementing a management systems approach does not happen overnight. It takes on average two to three years, in some cases five years, to fully convert a management culture or safety program into a functional, operating world-class system.

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