

So You're a Systems Type, Eh?

By Greg Zigulis

I spend much of my time helping companies evaluate their OSH programs, and making management system and program recommendations based on those evaluations. Effective OSH programs have many important components, such as safety leadership and safety climate, hazard identification, risk assessment and control, communication, technical requirements and compliance, training and employee engagement.

I have always been particularly interested in efforts to integrate OSH with other business functions. That approach began early in my career, when I found myself reporting to a plant manager who viewed himself as "Mr. Real World Practical." He took great pride in being the "plant manager's plant manager." He knew we should strive to minimize injuries and address safety issues, and he talked often about "permanent corrective action."

In practice, however, he did so one issue at a time, in isolation, often focusing on errors made by individual (floor) employees. He simply could not connect the dots between safety and other business functions. He cared about safety and had some good insights. Yet, he had some ideas from which he could not be dissuaded. He thought he was paying me a great compliment to say that he entrusted safety issues to me and knew that I would do whatever it took to keep him out of jail. "And, oh by the way, you need to come up with a great safety slogan," he insisted.

I was not in a position to tell him that his overall approach to safety was akin to playing whack-a-mole blindfolded. Over time, however, I was able to explain that we should not approach program development and improvement in isolation, addressing only individual program elements. I explained that programs and performance were linked to the organization's overall values, attitudes and management approach. I stressed that we needed more than

injury-rate-based goals, even if management used those goals to evaluate the plant's performance. And I emphasized that we needed to assess how employees were incentivized by the company, and that we should involve supervisors and managers, and hold them accountable for fulfilling their roles and responsibilities.

One day, I was reiterating that individual components of the OSH program are linked and that we needed to think more about that interrelatedness. "We need to do more than just develop programs and train people on procedures and punish those who failed to follow the rules," I said.



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"Oh, so you're one of those systems guys, huh?" he replied, to which I proudly said, "Yes, I am," believing it to be a good thing. In retrospect, his view was likely that people who focus on systems only care about process regardless of results (even though you can have both).

I was not talking about creating systems simply to have systems. I was talking about having the right systems, created intentionally, and with performance measurement and continuous

improvement in mind. Such systems not only can help reduce injuries, but also can improve compliance where there are links to illness and injury prevention.

The Value of a Systems Mind-Set

If your business does not have a safety management system or combined OSH management system in place, then employees including supervisors and managers may not be aware of legal and other requirements. As a result, they may do what they perceive to be incentivized by the organization, where necessary and affordable, and from various angles. This may lead to multiple programs, sometimes in conflict, with no direction or sustainability.

To move away from this approach, leadership must ask, "Will our organization continue to model programs based on dated injury causation models? Or will it, within its management system, move toward other models that incorporate principles for preventing serious injuries and fatalities?" No organization wants to leave performance to chance. An organization cannot simply rely on its supervisors to know what is best for the organization nor can it rely solely on an OSH manager. These individuals can only do so much, and staff changes over time. To succeed, an organization needs an approach that is system dependent and supported by leadership rather than one that is expert dependent.

Adopting a standardized approach, stellar companies can still be stellar, while lower-performing organizations can begin moving in the right direction. Having a safety management or combined OSH management system can enable goal setting, ensure needed processes and facilitate knowledge transfer.

Of course, the best-written systems and procedures can sit forgotten on shelves if the elements needed to support them, such as safety leadership, are missing. A strong safety management system is necessary for best performance, but it is not sufficient by itself. Once written documents are created describing what the organization will do (ideally with senior management participation and approval from the start), then the organization must do it.

Various Systems Models

Several safety management system models are available. Various factors

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determine what best fits an organization. I recently evaluated the potential impact of implementing the draft ISO 45001 international standard for occupational health and safety management systems on an organization with good programs. I also have evaluated safety management system models for organizations that have no safety management systems.

Draft ISO 45001 Standard

The company with good programs was an international organization. I was asked to compare its well-established OSH management system to the requirements contained in the draft ISO 45001 standard. The company was anticipating that if ISO 45001 were to be approved, its supply chain would start requiring certification to it. The company wanted to identify potential implementation issues.

A detailed evaluation indicated that the organization's existing programs were consistent with the requirements of the draft international standard, likely because its OSH management system was based on early versions of ISO 14001, OHSAS 18001 and plan-do-check-act principles. However, the draft ISO 45001 standard introduced some concepts not strongly present in the existing system. These include:

- An expectation for increased management involvement. To meet the standard's expectations, a company or location cannot simply hand off safety-related responsibility to the safety person(s).
- An increased emphasis on the meaningful participation of workers. This raises some questions about how companies will best manage the overall effort.
- A (somewhat broad) requirement for consultation both internally and externally (as relevant) with parties affected by or likely affected by the company's operations.
- Enhanced requirements for sharing information regarding hazard identification, risk assessment, controls, management system effectiveness, investigation results and more. This raises some concerns about confidentiality and legal issues.

Some form of ISO 45001 will likely be approved later this year, and it will produce many benefits across the globe. However, the organization evaluated against the draft standard must wait to



see the final requirements. When the language is finalized and approved, the organization may elect to implement ISO 45001 by reflecting its requirements in a revised global program or by seeking certification on a limited basis.

ANSI/ASSE Z10

The organizations with no safety management systems did not specifically ask for an evaluation of safety management systems options. Rather, they were assessing where they are compared to regulatory requirements, consensus standards and best practices. Personnel within these companies recognized a need to improve OSH, and they needed help with baseline assessments and game plans. They were looking for direction and guidance to make solid improvement decisions.

The evaluation revealed that these organizations would benefit from having a tool to provide easily understood concepts and systems. I shared comparisons between different safety

management systems. With the still uncertain status of ISO 45001, many companies may be well served to obtain their OSH-related road map from ANSI/ASSE Z10-2012, Occupational Health and Safety Management Systems. [ANSI/ASSE Z10-2012 was recently reaffirmed as ANSI/ASSE Z10-2012(R2017).]

Other models are available, but ANSI/ASSE Z10 is a well-written consensus document that contains helpful explanatory text and appendices. For an organization with no established safety management system, ANSI/ASSE Z10 is an excellent starting point. Furthermore, its use will likely facilitate ISO 45001 implementation should a company pursue that.

Would my long-ago plant manager have been influenced by a consensus standard such as ANSI/ASSE Z10? I believe so. If you are evaluating safety management system options and are not yet familiar with ANSI/ASSE Z10, take time to learn more about it.

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