

*How to Develop Effective*

# Safety Accountability



Presented by the Public Education Section  
Department of Business and Consumer Business  
Oregon OSHA



## OR-OSHA Mission Statement

To advance and improve workplace safety and health for all workers in Oregon.

### Consultative Services

- Offers no-cost on-site safety and health assistance to help Oregon employers recognize and correct safety and health problems in their workplaces.
- Provides consultations in the areas of safety, industrial hygiene, ergonomics, occupational safety and health programs, new-business assistance, the Safety and Health Achievement Recognition Program (SHARP), and the Voluntary Protection Program (VPP).

### Enforcement

- Offers pre-job conferences for mobile employers in industries such as logging and construction.
- Provides abatement assistance to employers who have received citations and provides compliance and technical assistance by phone.
- Inspects places of employment for occupational safety and health rule violations and investigates workplace safety and health complaints and accidents.

### Appeals, Informal Conferences

- Provides the opportunity for employers to hold informal meetings with OR-OSHA on workplace safety and health concerns.
- Discusses OR-OSHA's requirements and clarifies workplace safety or health violations.
- Discusses abatement dates and negotiates settlement agreements to resolve disputed citations.

### Standards & Technical Resources

- Develops, interprets, and provides technical advice on safety and health standards.
- Provides copies of all OR-OSHA occupational safety and health standards.
- Publishes booklets, pamphlets, and other materials to assist in the implementation of safety and health standards and programs.
- Operates a Resource Center containing books, topical files, technical periodicals, a video and film lending library, and more than 200 databases.

### Public Education & Conferences

- Conducts conferences, seminars, workshops, and rule forums.
- Presents many workshops that introduce managers, supervisors, safety committee members, and others to occupational safety and health requirements, technical programs, and safety and health management concepts.

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## Introduction

Accountability links responsibility to consequences. When Harry Truman said, “The buck stops here,” he meant that he was responsible for his decisions and he accepted the consequences that followed them.

Enforcement through a disciplinary procedure is one important piece of a balanced "culture of consequences." The other indispensable component is the regular use of positive recognition when employees meet or exceed expectations. Incentive and recognition is covered in OR-OSHA Course 126. In this workshop we will focus on the issue of "ensuring compliance" through effective enforcement of safety policies and rules.

There is little chance effective safety and health protection will exist without carefully designing rules for safe and healthful practices that cover all personnel, from the site manager to the hourly employees. Since hourly employees are most involved with activities exposing them to hazards, it makes good sense to include them in the establishment of safe work practices and safe work rules. Once these work practices are established and those who are expected to follow them understand why it is important to follow them, there is little need to utilize a corrective disciplinary system to ensure that they are followed.

### **At the end of the workshop, you should be able to:**

1. Define “accountability”
2. Discuss factors that motivate and sustain behavior in the workplace
2. Identify Oregon OSHA standards describing employer and employee responsibilities
3. Describe the key points of an effective accountability system

### **Before we start...**



- Getting around
- Ground rules
- Introductions
- Form teams

*Please Note:* This material, or any other material used to inform employers of compliance requirements of Oregon OSHA standards through simplification of the regulations should not be considered a substitute for any provisions of the Oregon Safe Employment Act or for any standards issued by Oregon OSHA. The information in this workbook is intended for classroom use only.



## Group Exercise: Warehouse Rodeo

**Instructions.** Your group is the safety committee for XYZ, Inc. You've been asked to evaluate the accident scenario below and recommend a course of action. Read the scenario and answer the questions below.

As a result of an Oregon OSHA accident investigation of a serious accident, XYZ, Inc. was awarded substantial penalties for violations of safety rules. During the investigation, the compliance officer learned that the injury occurred while two forklift drivers were engaging in horseplay. The two employees were playing the usual game of “warehouse rodeo” during lunch when the accident occurred. When confronted on the matter, the warehouse supervisor complained that he had “told those guys a number of times over the last year not to play that game,” but stopped when the plant superintendent told him to lay off and “let the guys have a little fun.” Other warehouse employees stated that the game was a common occurrence, but played only during lunch. The employer was able to produce related safety rules regarding the use of forklifts and other general work practices. Upon further research, the employer representative could not locate a written policy statement regarding accountability. The employer was also unable to produce any written evidence that safety rules were being enforced.

***Have company safety rules been violated? Yes \_\_\_\_\_ No \_\_\_\_\_***

**Describe the rules that were violated and those who were responsible for violating them.**

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**Describe the appropriate actions and the reasons you believe those actions are justified.**

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## What is effective accountability?

### Effective Accountability =

Authorized Behaviors + Objective Evaluation + Appropriate Consequences

The “condition” of effective accountability exists when an employee’s **authorized behavior** is objectively **evaluated** and results in appropriate **consequences**.

### Authority

At least three types of authority are necessary for a responsible person to perform assigned safety and health tasks effectively--these are:

- Authority over the **work** (employee/supervisor)
- Authority over needed **resources** (employee/supervisor)
- Authority over **employees** (supervisor)

### Behavior

Behavior is an observable action. It’s something we do.

### Evaluation

Evaluation is a judgment.

- Judge the behavior, not the person
- Judgment should be based on facts, not fiction

### Consequence

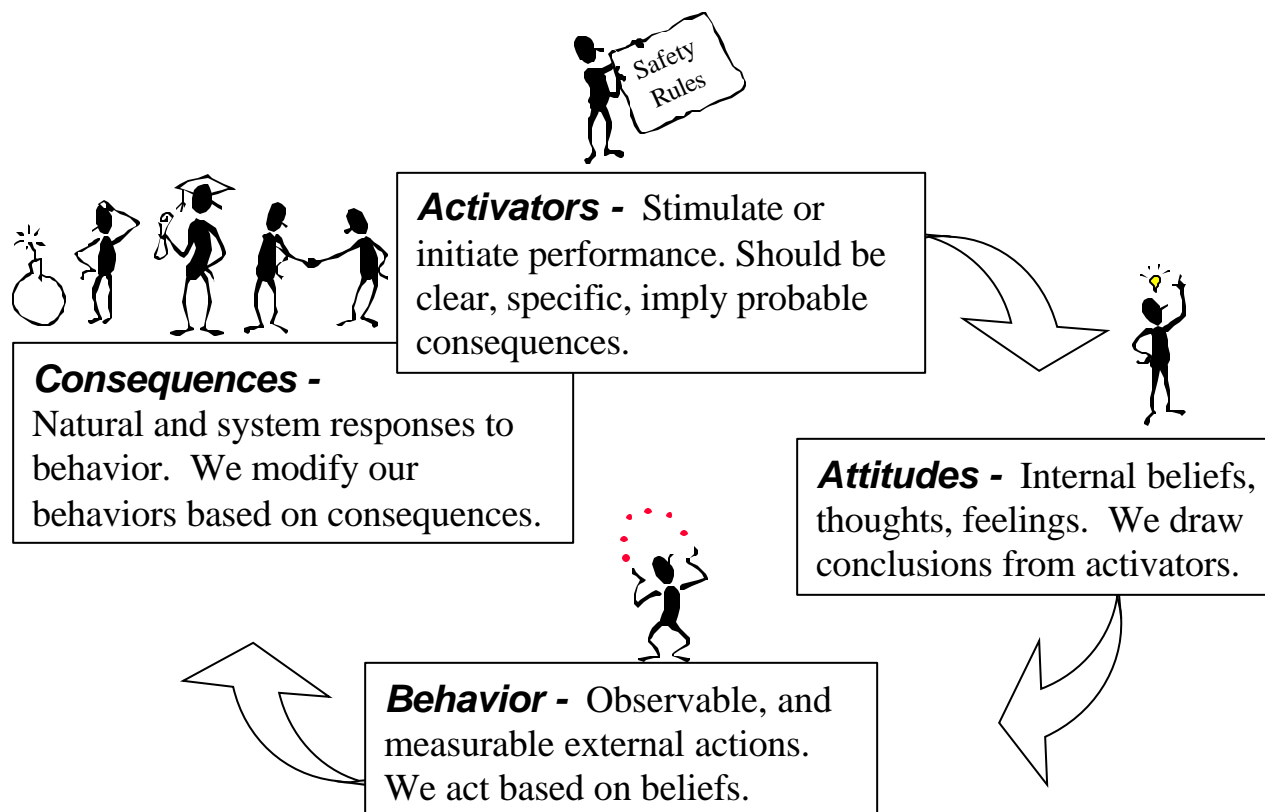
The result or effect caused by our behavior.

- Positive or negative
- Natural consequences – hurt or health
- System consequences – discipline or positive recognition

*“...most supervisors today know that they are responsible for safety, and they know what they should be doing, yet they do not do it. Why? Because they usually are not held accountable. That is, they are not measured in safety.” Dan Petersen - Safety by Objective*

## Why we do what we do in the workplace

Most of our safe and at-risk behaviors are learned behaviors, performed in particular settings to gain positive consequences or to avoid negative consequences.... We often learn what to do by watching others receive recognition or correction for their behaviors. (E. Scott Geller, Working Safe, p. 8687)



List examples of:

**Activators** \_\_\_\_\_

**Attitudes** \_\_\_\_\_

**Behaviors** \_\_\_\_\_

**Consequences** \_\_\_\_\_



## **Six Key Elements of an Accountability System**

An effective accountability system: establishes standards of performance; provides resources and supports performance; measures and evaluates performance; and reinforces desired performance through the appropriate application of effective consequences.

### **1. Formal Standards of Behavior**

- Clearly communicate performance expectations
- Write effective plans, policies, procedures

### **2. Adequate Resources and Support**

- Physical resources = tools, equipment, materials, workstations, facilities
- Psychosocial support = workload, schedules, training, assistance, leadership

### **3. Objective Evaluation of Behavior**

- Behaviors are observed and evaluated against standards
- Informal and formal observation procedures are used

### **4. Effective Consequences**

- Consequences increase frequency of desired behaviors
- Based on fact not feeling. Requires careful analysis

### **5. Appropriate Application**

- Applied only when justified
- Consistent throughout the organization

### **6. Evaluation of the System**

- OAR 437, Division 1, Rule 765(6)(f), Safety Committee Requirements
- Conducted by competent and qualified safety staff



## 1. Formal Standards of Behavior

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Standards represent the first set of inputs of an effective accountability system. They define performance criteria (behavior + results) and expectations. They represent the “benchmark” expectations required by the employer to make sure safe performance is achieved.

***What documents would you recommend as standards at XYZ?***

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***Why are written standards important in an accountability system?***

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***Extra credit: What is the impact on standards if the warehouse supervisor at XYZ ignores the forklift drivers' horseplay?***

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## Standards for managers and supervisors

**ORS 654.010 Employers to furnish safe place of employment.** Every employer shall...

- **furnish employment and a place of employment which are safe and healthful for employees** therein, and **shall furnish and use such devices and safeguards**, and
- **shall adopt and use such practices, means, methods, operations and processes** as are reasonably necessary to render such employment and place of employment safe and healthful, and
- **shall do every other thing reasonably necessary** to protect the life, safety and health of such employees.

**ORS 654.022 Duty to comply with safety and health orders, decisions and rules.** Every employer, owner, employee and other person shall

- obey and **comply with every requirement of every order, decision, direction, standard, rule or regulation**...
- do everything necessary or proper in order to **secure compliance** with and observance of every such order, decision, direction, standard, rule or regulation.

### 437-001-0760 Rules for all Workplaces

#### (1) Employers' Responsibilities.

- (a) The employer shall see that workers are properly **instructed** and **supervised** in the safe operation of any **machinery, tools, equipment, process, or practice** which they are authorized to use or apply.
- (b) The employer shall take all reasonable means to **require** employees to...



***According to the rules above, what are five basic management and supervisor responsibilities?***

1. \_\_\_\_\_
2. \_\_\_\_\_
3. \_\_\_\_\_
4. \_\_\_\_\_
5. \_\_\_\_\_

## Standards for employees

### OAR 437-001-0760 Rules for all Workplaces

#### (2) Employees' Responsibilities

- (a) Employees shall conduct their work in compliance with the safety rules contained in this code.
- (b) All injuries shall be reported immediately to the person in charge or other responsible representative of the employer....
- (h) Hazardous conditions or practices observed at any time shall be reported as soon as practicable to the person in charge or some other responsible representative of the employer.



***According to the rules above, what are three basic responsibilities employees have to the employer ?***

1. \_\_\_\_\_
2. \_\_\_\_\_
3. \_\_\_\_\_

## Standards for the safety committee

### OAR 437-001-0765 Rules for Workplace Safety Committees

#### (6) (f) Accountability:

The safety committee shall evaluate the employer's accountability system and make recommendations to implement supervisor and employee accountability for safety and health...



***According to the rule above, what are two important responsibilities the safety committee has to the employer?***

1. \_\_\_\_\_
2. \_\_\_\_\_



## 2. Adequate Resources and Support

### Physical resources

Another input to the system. If the employer is going to hold employees accountable for achieving company standards for safe behaviors and performance, the employer takes on the obligation to provide the physical resources needed to achieve those standards.



***What are some critical physical resources employees need in order to do their job and meet standards of safe operation?***

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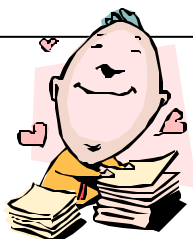
***How does management make sure employees have adequate resources in the workplace?***

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Bottom line: Adequate safety supervision is defined as identifying and correcting workplace hazards and employee behaviors before they cause an injury or illness.

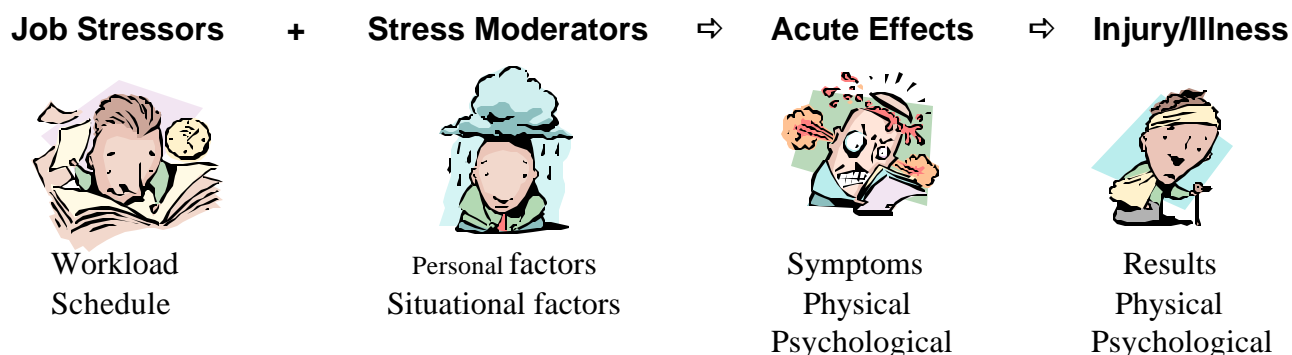


## Psychosocial Support

For the same reasons employees need physical resources to achieve standards of safe behavior and performance, psychosocial support also needs to be provided. Factors to consider include a supportive work environment, culture, education, training, adequate scheduling, reasonable production goals, and workload. Competent management and effective leadership provides employees the knowledge, skills, time, and social climate to achieve required standards of performance.

## Causes and Effects of Stress

Job stress can be defined as the harmful physical and emotional responses that occur when the requirements of the job do not match the capabilities, resources, or needs of the worker. Job stress can lead to poor health and even injury.



**Normal workplace stress will become negative "distress" when the employee believes he or she lacks C\_\_\_\_\_!**

***What programs and management actions are important in helping reduce stress in the workplace?***

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### 3. Objective Evaluation of Behavior

There may be many strategies to evaluate employee behavior. Whatever the method, evaluation should emphasize safety behaviors rather than safety results. Evaluation should be objective, not subjective. Formal and informal methods of performance measurement are essential to a properly functioning safety management system.

#### **Behaviors and activities to evaluate in an effective culture of consequences**



***What criteria would you, as a supervisor, use to evaluate your employees?***

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***What criteria would you, as a manager, use to evaluate your supervisors?***

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***What criteria would you, as the employer, use to evaluate your managers?***

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***Is it ever appropriate to discipline an employee because they had an accident? Yes \_\_\_\_ No \_\_\_\_ Why?***

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## 4. Effective Consequences

### Every culture is a culture of consequences

#### **Positive reinforcement** - desired consequences

- When effective, increase desired compliance and voluntary behavior
- The worker performs to receive the positive consequence
- The worker may perform far beyond minimum standards - discretionary effort
- Strategies are success-based and supportive
- “If I report a hazard, I will be recognized.”
- “If I prevent an injury or save money, I will be rewarded.”



#### **Negative reinforcement** - undesired consequences

- When effective, it increases desired compliance behaviors
- The worker performs to avoid the negative consequences
- The worker performs to minimum standard - just enough to get by
- Strategies are fear-based and controlling
- “If I comply with safety rules, I won’t be disciplined.”



***What happens when undesired behaviors are ignored?***

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***What happens when desired behaviors are ignored?***

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**5R's of Discipline: Regularly Recognize and Reward so you Rarely have to Reprimand!**

***How do you know consequences are effective?***

Effective consequences \_\_\_\_\_ the frequency of desired behaviors!

***Do we always follow posted speed limits? Yes or No Why?***

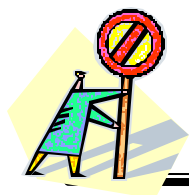
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***Why is it important to have a "progressive" disciplinary process?***

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## 5. Appropriate Application

***What are the criteria for appropriate consequences?***

- Consequences are justified.
  - ✓ Not justified if the safety management system has failed the employee.
  - ✓ Justified when the employee has failed the system
- Consequences correspond to the degree of positive or negative impact of the behavior.
- Consequences are applied consistently throughout the entire organization.

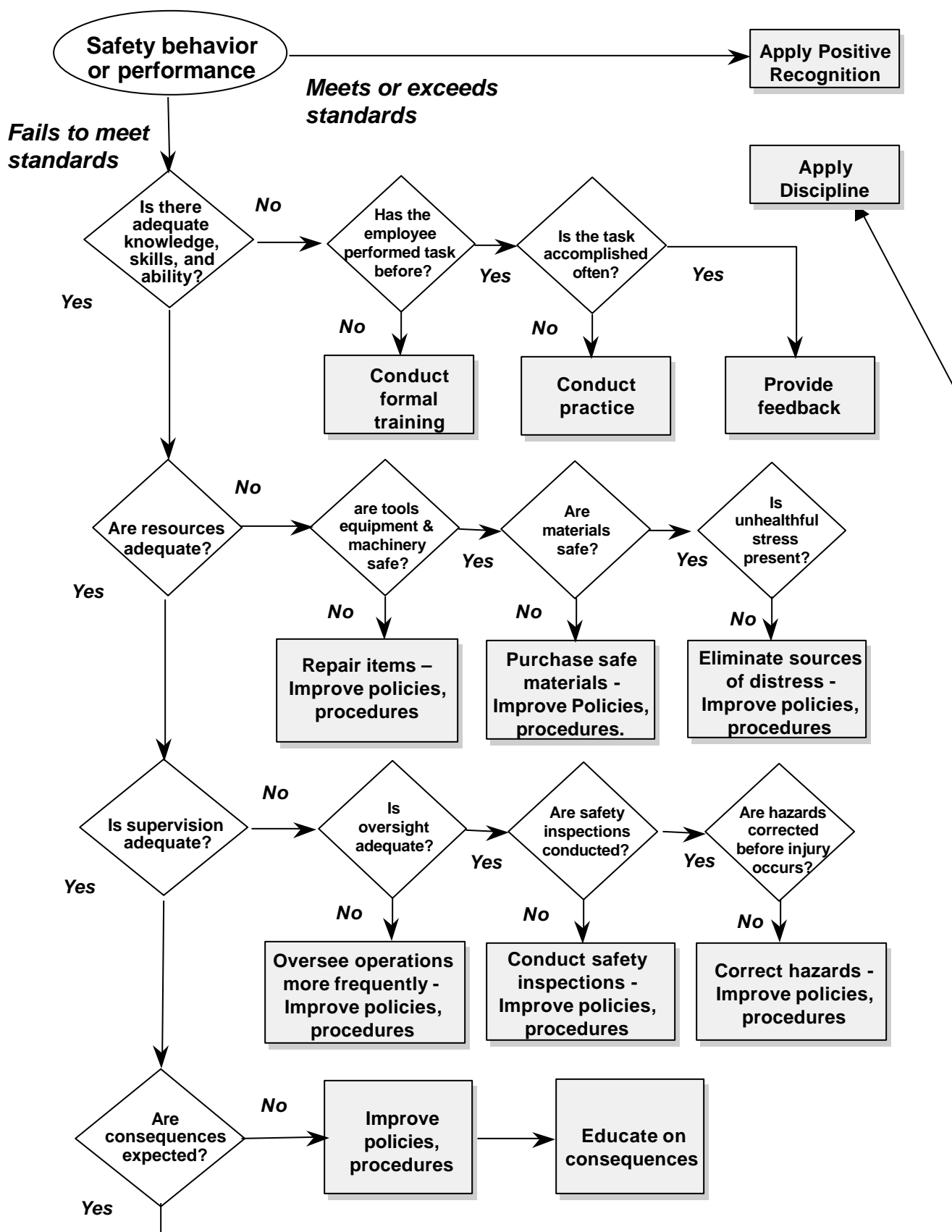


***What happens when consequences are not consistently applied throughout the organization?***

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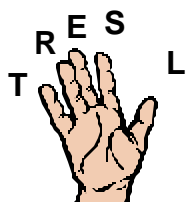
## Decision Tree to Help Determine if Discipline is Appropriate





## ***First Question: Are you sure you're justified before disciplining?***

For discipline to be justified, those in control should fulfill their obligations to the employee first.



***Before pointing the finger of blame...what questions should the supervisor or manager ask first? Take the five-finger test.***

***Have I provided adequate T \_\_\_\_\_?***

***Have I provided adequate R \_\_\_\_\_?***

***Have I E \_\_\_\_\_ safety rules?***

***Have I adequately S \_\_\_\_\_ the work?***

***Have I demonstrate adequate safety L \_\_\_\_\_?***

***What is an appropriate response by the supervisor if one or more of these obligations have not been met?***

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## Six Principles of Effective Discipline

***Discipline should be administered S\_\_\_\_\_*** - It should occur after it's determined that discipline is justified.

- Be sure discipline is based on fact, not feeling
- Be slow to discipline. Carefully analyze the system first.

***Discipline the employee in S\_\_\_\_\_*** - Don't make it a matter of public discussion.

***The employer and employee should be S\_\_\_\_\_ about why discipline is necessary*** - They both know exactly why the discipline is being administered.

- Address the specific safety performance failure – the policy or rule violated
- Do not accuse the person of somehow being flawed by using labels (mad, bad, lazy, crazy, stupid, etc.)

***Consequences should be perceived as S\_\_\_\_\_*** - The importance of the consequence is determined by the receiver.

- Progressive discipline increases the significance at each stage.
- This criteria is defined by the receiver.
- What is effective for one person may not be effective for another.
- Effective discipline must increase the frequency of desired behaviors.

***Discipline should be S\_\_\_\_\_*** - Disciplinary procedures should be designed to be administered in an efficient yet appropriate manner.

***The employer should be S\_\_\_\_\_*** - Genuine concern for the employee's safety is the motivation.

- Don't discipline just because it's policy. That's perceived as self-serving.
- Discipline to improve performance, not to punish

**Bottom line:** To be effective, discipline must be the right consequence, administered by the right person, at the right time, in the right way, for the right reason! Does that sound like leadership?

## Discipline is a matter of leadership

Discipline is an opportunity to demonstrate safety leadership. To do that, discipline must ultimately improve working relationships. What are important points to remember?

### The "Rights" of Effective Leadership Applied to Discipline:

#### The Right Way = The Right Results

1. Discipline the right person: *Who?* \_\_\_\_\_

\_\_\_\_\_

2. Discipline at the right time: *When?* \_\_\_\_\_

\_\_\_\_\_

3. Discipline in the right place: *Where?* \_\_\_\_\_

\_\_\_\_\_

4. Discipline for the right reason: *Why?* \_\_\_\_\_

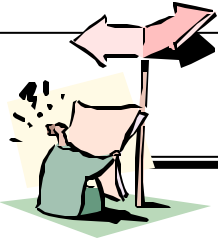
\_\_\_\_\_

5. Discipline in the right way: *How?* \_\_\_\_\_

\_\_\_\_\_



The 3-R's About Rules: Rules without Relationship lead to Rebellion!



## 6. Evaluation of the System

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### Evaluate how effectively the accountability system is designed and performing.

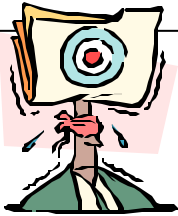
As mentioned earlier, the safety committees is required by OR-OSHA standards to evaluate the employer's safety accountability system. Every accountability system is different, but generally the following process is successful in evaluating and improving accountability systems.



### Process for evaluating the accountability system

1. **Identify.** Inspect the workplace conditions and behaviors. Audit various elements of your accountability system policies, procedures, processes and practices to determine what exists. Survey to determine what employees think.
2. **Analyze.** Dissect and thoroughly study each accountability system policy, process, procedure and practice to understand what they look like and how well they are being carried out. The devil is in the detail.
3. **Evaluate.** Compare and contrast the design and performance of each accountability system policy, process, procedure, and practice against best practices to judge their effectiveness.

Not knowing why things get better or worse is always a problem for a business. If it gets better “for no reason,” later it will probably get worse “for no reason.” ...The point is, it’s not enough to know that something works. It is vitally important to know why it works. (Aubrey Daniels, Bringing Out The Best in People, p. 14)



## **Evaluate to make sure your accountability system is on target with this audit**

Here's a simple program audit your safety committee can use to evaluate your organization's accountability system.

(0=Not Present, 1=Needs Improvement, 3=Adequate, 5=Superior)

- **Formal standards of behavior.**

- Do clear safety policies, plans, processes, procedures, practices exist?
- Are safety standards written in the primary language(s) of all employees?
- Are safety policies and rules discussed with new employees at orientation?
- Are safety policies and rules communicated adequately to employees?

- **Resources and Support.**

### **Physical**

- Are tools, equipment, machinery and materials adequate in ensuring a safe workplace?
- Are workstations designed to be ergonomically appropriate for the assigned worker?
- Is adequate Personal Protective Equipment provided to employees?
- Do temperature, chemical, noise, atmospheric and other environmental safety hazards exist?

### **Psychosocial**

- Is adequate initial safety orientation training being provided?
- Is adequate safety training on specific safety procedures being provided?
- Is management providing adequate safety leadership through example?
- Are workloads reasonable? (Employee has ability to complete work without undue physical or psychological stress)
- Are work shifts reasonable? (Does not produce excessive fatigue)
- Is an Employee Assistance Program (EAP) available?
- Do employees suffer any negative consequences from working safe?
- Do positive working relationships exist between employees and supervisors?

- **Evaluation of behavior.**

- Is an effective informal observation and feedback process being conducted, or...
- Is a effective formal observation process in place?
- Are the results of observations being tracked to improve the safety management system?
- Do formal appraisals/reviews index safety performance?
- Do employees have control over behaviors/results being measured?

- **Effective consequences.**

- ? Is discipline for noncompliance expected?
- Does discipline occur soon after justification is established?
- Do employees know exactly what behaviors lead to discipline?
- Are the motives for disciplining perceived as sincere?
- Do disciplinary procedures change behavior/performance in the desired direction?
- Is discipline progressively more significant for repeated noncompliance?

- **Appropriate Application.**

- Does management first determine that their obligations to employees are have been fulfilled before disciplining? (Clear expectations, resources, training, enforcement, example)
- Does discipline occur as a result of failure to comply with safety policies and rules (behaviors) rather than “having an accident” (results)?
- Are employees automatically disqualified from safety recognition/rewards if they have an accident?
- Is discipline consistently applied throughout the organization - top to bottom and across functions?
- Is the purpose of discipline to improve performance rather than merely to punish?
- Is recognition occurring more often than discipline?
- Is discipline appropriate to the severity of the infraction?
- Is discipline appropriate to the negative impact the infraction has on the company?

- **Evaluation of the accountability system.**

- Is the safety committee evaluating the accountability system on a periodic/continuous schedule?
- Are all processes within each of the accountability system elements evaluated?
- Does the safety committee submit the evaluation results to management?
- Does the safety committee develop and submit recommendations to improve the accountability system?
- Does management respond to and implement safety committee recommendations?

## The Deming 4-Step Improvement Process



W. Edwards Deming was an internationally renowned consultant whose work led Japanese industry into principles of management and revolutionized their quality and productivity. He is considered the father of Total Quality Management (TQM) and author of Out of The Crisis and many other books and articles.

### 1. Plan it! – Design the change or test

**Purpose:** Take time to thoroughly plan the change before it's implemented

- Pinpoint specific conditions, behaviors, results you expect to see
- Plan to ensure successful transition as well as change

### 2. Do it! - Carry out the change or test

**Purpose:** Implement the change or test it on a small scale

- Educate, train, communicate the change...help everyone transition
- Keep the change small to better measure variable

### 3. Study it! – Examine the results of the change or test

**Purpose:** To determine what was learned: what went right or wrong.

- Statistical process analysis, surveys, questionnaires, interviews
- It's critical to understand why the positive and negative effects occurred

### 4. Act on it! – Adopt, abandon, or repeat the cycle

**Purpose:** Incorporate what works into the system

- Ask if we're doing the right things, in the right way, for the right reason
- Abandon the change or begin the cycle again with the new knowledge gained



## Let's Review

1. Accountability = B \_\_\_\_\_ + E \_\_\_\_\_ + C \_\_\_\_\_
2. When someone is assigned \_\_\_\_\_ to act, they have been given \_\_\_\_\_ to act, and should be held \_\_\_\_\_ for those actions.  
(accountable, authority, responsibility)
3. The transition from positive stress to negative distress occurs when:  
\_\_\_\_\_
4. According to the text, three basic employee responsibilities are:  
\_\_\_\_\_  
\_\_\_\_\_
5. Scheduling a reasonable workload is an example of providing an adequate \_\_\_\_\_ environment. (physical, psychosocial)
6. True/False. The safety committee is required by OR-OSHA law to analyze the employer's safety accountability system.
7. True/False. Employees should be disciplined immediately after the unsafe behavior occurs.
8. To be effective, consequences must \_\_\_\_\_ the frequency of desired behaviors. (increase, decrease)
9. Before disciplining, the supervisor should ask all of the following questions except?
  - a. Have I provided the necessary resources?
  - b. Has the employee been properly trained?
  - c. Has the employee used common sense?
  - d. Does the employee know I will discipline?
  - e. Am I adequately overseeing work?
10. True/False. When implementing a change, limit the potential damage by testing on a small scale.





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