

Building

ON YOUR

VPP Success

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Achieving the Occupational Safety and Health Administration's (OSHA) Voluntary Protection Programs (VPP) status is a big achievement, the culmination of lots of hard work from quite a few people in your organization. But is this the end of the journey? Do you want it to be or do you want something more? Once VPP has been achieved, it should be used as a springboard to reaching bigger and better world-class safety through continuous improvement. There are many companies and locations that tout VPP as a way to achieve long-term success and sustainability. With a track record of more than 28 years, the VPP approach proves achieving zero injuries is possible.

How can you increase worker protection, cut business costs, enhance productivity and improve employee morale?

Answer: Do a better job of managing your company's safety and health program. OSHA is convinced that effective management is the key to reducing the numbers and severity of workplace injuries and illnesses. This means using proven methods to find and understand existing and potential hazards; and then either preventing or controlling those hazards. Thus, management commitment became one of the four principle pillars for safety program management.

At the same time as OSHA's VPP was being implemented, other business initiatives were beginning to take hold, emphasizing the importance of employee involvement. A simple Google search on the relationship between employee involvement and total quality management (TQM) verifies the importance that employee involvement has in the overall effectiveness of TQM. Likewise, OSHA's experience was so profound that their internal guidance in 1985 now required employee involvement for VPP approval.

While employee involvement is not intended to transfer management's legal responsibilities for safety to workers, an important element in establishing a content and prosperous atmosphere is to insist upon free, open and honest communication up and down the management structure. Workers

participating in organizational decisions tend to increase their level of ownership and responsibility, and thus behavior and attitude, while management enhances its role as facilitator and expeditor.

Together, management commitment and employee involvement are now defined as "culture"; the culture that ultimately drives sustainability of safety programs and achieves a safe and healthful workplace.

Fundamental Elements

Just like building a house, you start with a strong foundation. Just like learning a sport like golf or football, you first learn the fundamentals, so you can eventually excel at the events themselves. So, history lesson aside, which management commitment elements drive the success of the others? Which VPP elements offer the most benefit for long-term success? How do you make these even stronger? We will discuss what are called the "fundamental elements" and why they are the fundamentals.

+ "Accountability" and "measuring the right things" (establishing smart goals and objectives) are two processes that ultimately drive the overall success of the others. For example, many organizations still use incidence rates as a goal or target. When pressed about "how" this will happen, the answer often becomes less clear.

As a suggested alternative, let's learn from D. Edwards Deming, the guru of quality processes, and some of his 14 principles. Three of his principles are particularly relevant to this discussion:

+ **Principle #3.** Cease dependence on inspection to achieve quality. By inspecting the inputs and the process more, the outputs can be better predicted and inspected less. Rather than using mass inspection, look for cause-effect relationships.

+ **Principle #5.** Improve constantly and forever the system of production and service. It is a call for continuous improvement. If you can measure the process, results will take care of themselves.

+ **Principle #10.** Slogans like "Produce zero defects" and "Do it right the first time" are quite common. But, as Deming stressed, they are also quite meaningless.

At best, they are ignored. At worst, they infuriate people who understand that the system causes errors, not the workers.

The VPP elements are no longer considered "programs" but are now referred to as "processes." As is often quoted by quality experts, "The results will take care of themselves when you take care of the process." So if you allow an extrapolation, then "measuring the right things," becomes measuring "processes." To Deming's point, continuous improvement of the "processes" becomes the goal, not just a zero-based outcome. Likewise, holding the organization "accountable" to achieving the goals might logically be another fundamental element.

In defining goals and objectives, OSHA has been clear that goals need to be supported by objectives (action plans). Let's take a look at what Deming might classify as a "goal." To start with, it should not be a "zero" based metric. Zero is often already the mission or value statement (policy), thus stating it again as the goal is redundant. Deming suggests goals be a "process improvement" concept. As part of the annual evaluation, let's assume a weakness is identified relative to the ability of the organization to perform hazard identification. Improving the hazard identification process would become the goal. Since goals need targets, a fully stated goal answering "why" and "how" would have more impact. For example:

Improve our hazard identification process to reduce the severity of hazards by using more substitution and engineering controls.

"To" addresses the why and "by" addresses the how. In addition to being process-related, this statement of the goal also better communicates and perhaps improves the potential for buy-in and personal commitment on the part of the organization.

Next, objectives or action plans should be developed to flesh out how the goal will be achieved. For example, objectives for the above goals could include:

Engineering and line supervision will complete one job safety analysis each month in each department, with follow-up revision of safe work procedures and employee training by the following month. Ensure that at least one control is upgraded to an elimination, substitution or engineering control.

This objective above is measurable, has specific targets as well as responsibilities and provides for a safer and more healthful workplace through the continuous improvement of control selection.

Measuring the right people in the organization on the right things becomes essential. The organization's management provides the resources to get things done and bears responsibility for achieving goals. Workers are accountable for their actions and objectives. They should be measured on the objectives or actions, not whether or not they have achieved the goal.

Thus, the two management commitment elements are essential parts of the foundation and need to be your strongest elements as well as the focus for continuous improvement.

Employee involvement is essential for a VPP system to succeed. However, starting with employee involvement without building a foundation of successful processes for them to get involved in is often a struggle or frustration for many sites beginning the journey. While many eventually succeed in obtaining VPP approval, focusing on employee involvement primarily, without first achieving management commitment and good sound processes, is something that should be developed strategically. Let's take a look at some of the other fundamental elements before we come back to discussing employee involvement.

Worksite Analysis

Worksite analysis processes help us to identify hazards and controls. Since providing a safe and healthful workplace is the ultimate target, doing worksite analysis elements well provides additional safety data that can be trended. This data can be used to develop additional goals and objectives and provides leading metrics, rather than lagging metrics like incident trend analysis. Focusing your continuous

improvement and employee involvement efforts on worksite analysis elements also pays big dividends toward sustainability and building on success. For example, the goal of an inspection/observation process is to reduce the frequency of unsafe acts and conditions. So, is the reduction of unsafe acts and conditions what your inspection process measures? Do you analyze trends that repeat, for instance, blocked fire exits? For repeat problems, doing more inspections only gives you more data, not fewer blocked exits. Trending inspection/observation data tells you where you may need to develop some goals and objectives or solutions. Here is where you can integrate your inspection/observation process with another process, in this case, incident analysis (accident investigation), which will help you identify root causes.

Incident analysis is supposed to ask "why" until you get to the root cause analysis to identify a more permanent solution. Unblocking a fire exit over and over again, without exploring the reasons why, can be a frustrating exercise. Whether investigating incidents or near miss/close call data, such as blocked fire exits, the ability to get to root causes is an absolutely essential or fundamental element that needs to be continuously improved.

The hazard analysis process is another fundamental element. This is our ultimate prevention tool. Looking at hazards before they cause incidents, identifying and communicating the right controls, are often the first steps in building the foundation. Hazard analysis, performed with the goal of continuing to identify new engineering, substitution and elimination controls, will provide a safer workplace. Stopping at administrative (warnings, training, job rotation, etc.) or personal protective equipment (PPE) controls does not eliminate hazards. Subsequently, linking the hazard analysis process with your inspection/observation process may become a means to verify that controls are in place and used. Just like the traditional behavior observation metric of "percentage of safe vs. unsafe," inspections can report the same metric for conditions (percentage of conformance), or knowledge if inspections include interview questions. If the items listed on your inspection/observation checklist are

derived from the most serious hazards and the most needed controls as identified by your hazard analysis process, the data could be a valuable leading metric, as well as an indicator that accidents are about to happen.

When linked, the worksite analysis and hazard prevention and control pillars provide a necessary foundation upon which your training and communication can be based.

Employee Involvement

Once the foundation is set and the fundamentals are beginning to take shape, getting the organization to see the value of safety and practice it on their own is the goal of employee involvement. As involvement matures to ownership and engagement, there is one other fundamental element that complements employee involvement. That element is recognition. OSHA strongly recommends that the recognition program NOT be based on accident rates but be based on proactive participation. When recognition is tied to the leading data mentioned above, like the reduction of unsafe acts and conditions or the achievement of objectives, this creates a win-win for management and workers alike. When workers have some of the decision-making authority to identify awards, establish objectives, etc., then employee involvement has matured to ownership and engagement.

Whether building VPP for the first time or driving sustainability and continuous improvement, building on and enhancing your foundation or fundamentals is a common theme to overall, long-term success. Making these elements the strongest and continually improving these elements, not only as separate processes but the integration of these processes with each other, is one way to build on your VPP success. ★

"Building on Your VPP Success" was presented by Paul Esposito, CIH, CSP, vice president of ESIS Inc. at the 26th Annual National VPPPA Conference in Orlando, Fla. Any opinions and positions in this presentation are the presenter's own and not necessarily those of any ACE company.