Brief Senior Management: A Company's "Safety Culture" Comes from the Top Down



An airplane making a flight within Qu_bec started its take-off run at the Qu_bec/Jean Lesage International Airport. Sixty-eight seconds later, the co-pilot informed the airport controller that due to a problem with the right engine, they'd be returning to land. Soon thereafter, the co-pilot requested aircraft rescue and firefighting services, saying the plane couldn't climb. A few seconds later, the plane hit the ground short of the end of the runway, traveling 115 feet before striking a berm. It broke up and caught fire. The two crew members and five passengers died. In investigating the crash, the Transportation Safety Board (TSB) found that the airline's poor safety culture contributed to the acceptance of unsafe practices [Aviation Investigation Report A1000098].

THE PROBLEM

'Safety culture' isn't just a fancy term that doesn't really mean anything. A company's safety culture directly impacts the safety of its workers and the effectiveness of its OHS program. Government organizations that investigate safety incidents, such as the TSB or provincial/territorial ministries, and courts that rule on OHS violations look at a company's safety culture, among other things, when trying to determine the causes of an incident. And if that culture is found to be lacking and even partly responsible for what

happened, this failure can be costly. The TSB's report on the Qu_bec plane crash illustrates that having an OHS program and safety policies aren't enough'companies must also have strong safety cultures that establish worker safety as a priority for all stakeholders.

THE EXPLANATION

A safety culture has an influence on all parts of a company and is characterized by proactive initiatives for identifying and managing risks, commitment from management and clear policies and procedures that are put into practice. Conversely, a lack of a safety culture is characterized by reactive initiatives rather than proactive risk-related initiatives. Transport Canada describes a safety culture as:

- An informed culture: people understand the hazards and risks involved in their own operations and all employees work continuously to identify and overcome threats to safety;
- A just culture: errors are understood but willful violations aren't tolerated; workers know and agree on what's acceptable and unacceptable;
- A reporting culture: workers are encouraged to voice safety concerns and when they do so, those concerns are analyzed and appropriate action is taken; and
- A learning culture: workers are encouraged to develop and apply their own skills and knowledge to enhance workplace safety; management updates workers on safety issues; safety reports are given to workers so that everyone learns the lessons.

Although the OHS laws don't require employers to have safety cultures, having a strong safety culture is an implied part of due diligence. That is, when deciding whether the company'and maybe its senior management'took all reasonable steps to prevent an OHS violation or safety incident, courts will consider the company's safety culture or the lack of one.

In its report on the investigation of the plane crash, the TSB criticized various aspects of the airline's culture as to safety, including:

- Transport Canada had previously conducted a safety analysis of the airline's operations and concluded that, unless there was a radical change in management culture, only close monitoring of its operations would improve its safety performance. The airline responded by disputing these findings.
- Management knew that some of the operation's practices violated its written directives. The TSB concluded that 'these institutional deviations designed to circumvent safety requirements' suggested that management wasn't fully committed to safety promotion.
- There was a conflict between encouraging all employees to report safety concerns and the existence of a penalty-based system.
- There was no documentation confirming that safety meetings were held.
- Training programs didn't comply with the regulations and training records were incomplete.

THE LESSON

A safety culture requires a concrete, true commitment from senior management. To create a safety culture in the company, consider the four P's of safety management:

- Philosophy: Safety begins with senior management, which establishes a philosophy acknowledging the existence of risks, sets the company's standards and confirms that safety is everyone's responsibility.
- Policy: A company's policies determine how the safety objectives in this philosophy will be met by clearly defining responsibilities; developing processes and structures to incorporate safety into all aspects of the operation; and developing workers' skills and knowledge.

- **Procedures**: Procedures are directives for workers and set management's expectations.
- **Practices**: Practices are what *really* happens on the job, which can differ from procedures, in some cases increasing threats to safety.

INSIDER SOURCE

'<u>Aviation Investigation Report A1000098</u>,' Transportation Safety Board of Canada, Aug. 15, 2012