This course is for employees, supervisors, managers and safety staff who are responsible for developing and maintaining effective accountability programs within their safety management systems.
OSHAcademy Course 116 Study Guide

Introduction to Safety Accountability

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This study guide is designed to be reviewed off-line as a tool for preparation to successfully complete OSHAcademy Course 116.

Read each module, answer the quiz questions, and submit the quiz questions online through the course webpage. You can print the post-quiz response screen which will contain the correct answers to the questions.

The final exam will consist of questions developed from the course content and module quizzes.

We hope you enjoy the course and if you have any questions, feel free to email or call:

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Modules and Learning Objectives

Module 1 – Standards, Resources, and Measurement

Learning objectives in this module include:

- Contrast the difference between "responsibility" and "accountability."
- List the six elements of an effective safety accountability program.
- Discuss why it is important to have formal standards of performance in a safety management system.
- Give examples of providing adequate resources and psychosocial support.
- Give examples of key performance indicators (KPIs) for managers, supervisor, and employees.
- Discuss the criteria required before holding employees accountable in safety is appropriate.

Module 2 – Rights and Responsibilities

Learning objectives in this module include:

- Discuss the concept of "cause and effect" and how it applies to safety accountability.
- Define and give examples of positive/negative reinforcement, and positive/negative punishment.
- Discuss why "ignoring," as a consequence, is so damaging to an effective safety culture.
Course Introduction

Accountability ranks right at the top with management commitment as a critical element in a company's safety and health management system. Accountability is one of the answers to the question, "why do we behave the way we do in the workplace?" Why do we behave the way we do in the workplace? **Consequences.** So, it's important we understand what it is and how it should work as part of the safety management system.

Management may impose all kinds of safety policies, programs, written plans, directives, rules, and training on the workforce, but as you'll soon learn, none of that effort will matter unless the appropriate application of effective consequences within a culture of accountability exists: only then will desired behaviors be sustained. After all, employees must believe they are going to be held accountable for the decisions they make and the actions they take, or you can be sure that any safety management effort is ultimately doomed to failure.
Module 1: Standards, Resources, and Measurement

What is "Accountability?"

You hear the terms "responsibility" and "accountability" a lot when dealing with safety and health, and sometimes people use the terms as though they have the same meaning. The question to ask is, "are you responsible and accountable for your safety performance?" So, let's take a look at both concepts to help answer that important question.

Are you responsible?

Being "responsible" implies that you have been assigned a position or have a duty to perform. One important employee responsibility is to work safely. Think of "responsibility" is an assignment.

Are you accountable?

Being "accountable" exists when you are subject to consequences based on your safety performance. Accountability is a condition that exists when outcomes your employer administers depend on your safety performance.

In other words, when you are held accountable, your safety performance is measured against company performance standards and expectations, and based on your performance, consequences are administered. As you'll see, those consequences are perceived as positive or negative.

For example, an employer is held accountable by OSHA standards that detail specific performance requirements. Since accountability requires a consequence, one of two outcomes must occur:

OSHA and Accountability

1. If OSHA inspects a workplace and determines that the employer meets or exceeds their standards, OSHA is happy, and they go away, and consequently, the employer is happy.

2. If the employer fails to meet safety standards, OSHA may cite the employer for violations and issue monetary penalties. OSHA is not happy, and the employer is most certainly not happy.
In either case, OSHA administers consequences - the leave or they penalize. Just remember, effective accountability for safety exists only when employee performance results in appropriate consequences: This is the fundamental principle of a successful accountability system.

**Quiz Instructions**

After each section, there is a quiz question. Make sure to read the material in each section to discover the correct answer to these questions. Circle the correct answer. When you are finished go online to take the final exam. This exam is open book, so you can use this study guide.

1. What is the difference between responsibility and accountability?
   a. Responsibility and accountability should be thought of as the same
   b. Responsibility is an assignment of duties: accountability results in measured performance
   c. Responsibility will usually result in consequences: accountability does not
   d. Responsibility automatically includes accountability and consequences

**The Six Elements of an Effective Accountability System**

Accountability is one of the most important elements within the safety management system (SMS) because if you don't have it, it's impossible for the safety management system to function effectively. Although the intended purpose of the SMS is always to prevent accidents and save money, the SMS may actually unintentionally function to do just the opposite. Remember, the road to Hell is paved with good intentions. With this in mind, we're going to discuss the six important elements within a Safety Accountability Program that help the employer achieve the purpose of an effective SMS. Those six elements are:

1. **Formal standards of performance:** Everyone is expected to work to an expected level of performance.

2. **Adequate resources and support:** The employer must provide the resources and support to achieve expected performance.

3. **A system of performance measurement:** Performance must be measured in an objective manner.
4. The application of effective consequences: Consequences are effective when they increase desired behaviors.

5. The appropriate application of consequences: Consequences, such as discipline, are appropriate when they are justified, objective and administered only after careful analysis.

6. Continuous evaluation of the accountability program: Accountability is analyzed and evaluated so that it may continually improve.

You can use the guidelines in the six elements of an accountability system to help design, develop, and deploy an effective accountability system.

With that in mind, let's take a look at an example of how each of the six elements can be evaluated to determine if the accountability program is effective.

2. Which of the following is NOT one of the six elements of an effective safety accountability program?
   a. Formal standards of performance
   b. Adequate resources and support
   c. Zero tolerance for errors
   d. Appropriate application of consequences

What's Wrong With This Picture?

Given the criteria for effective accountability above, read the following scenario to determine if discipline is appropriate.

_Gloria, the shipping supervisor at XYZ Distributors, immediately suspended Joe, a forklift driver, for two days without pay for driving a forklift into a 55-gallon drum of agent-x that resulted in an uncontrolled release of hazardous chemical. Gloria was under a lot of pressure from her manager to get three late shipments of product out the door before the end of the work shift. Because of the incident, the company's emergency response team had to activated to contain the spill and an outside contractor hired to clean the spill._

_The follow-up incident analysis determined that the brakes on the lift truck were defective. No preventive maintenance inspection on the forklift had been conducted for five months. Neither the supervisor nor driver from the previous shift had reported the condition at shift changeover._
Joe notified Gloria (per safety policy) at the beginning of the shift that he believed the brakes might be weak. Gloria, who was "buried in paperwork," responded with, "just be careful and use common sense."

If you think Gloria was justified in disciplining Joe, please read the partial findings in the next section very carefully. Unfortunately discipline like this is commonly administered subjectively, blaming the employee, not the safety management system.

3. Unfortunately discipline is commonly administered _____.
   a. subjectively, blaming the employee
   b. after analyzing the facts
   c. slowly after careful thought
   d. consistently when justified

Appropriate Discipline

Let's take a look at a few of the possible accountability system failures in the previous scenario that supports the position that discipline was not justified nor appropriate:

1. Standards of performance: Gloria responded to Joe's hazard report by merely telling him to be careful. As an agent of the employer, she actually "rewrote" and reversed a very important safety policy prohibiting the use of defective equipment. Thus, operating a forklift with defective brakes was allowed if Joe "just used common sense."
   Improvement: Education on OSHA supervisor responsibilities.

2. Physical resources: Gloria's decision to allowed Joe to continue use of a defective forklift. Improvement: Develop and implement preventive maintenance policy and inspection procedures.

3. Lack of adequate education and training: Gloria may have not received adequate education and training on the company's safety accountability system and disciplinary procedures. Improvement: Design and conduct management education and training on concepts of accountability policies and procedures.

4. Failure to detect and correct: The prior shift supervisor and employee did not detect or correct the defective forklift prior to the incident. Improvement: Design and conduct management training on safety oversight and reporting responsibilities.
5. **Lack of analysis**: Gloria administered discipline too soon; before the facts uncovered in the follow-up incident analysis were completed. Improvement: Design and conduct management training on disciplinary procedures.

6. **Discipline based on subjective data**: Gloria did not have the facts before disciplining. Discipline was the result of an emotional reaction and based on assumptions. In this case, had she waited, she would have realized that discipline was not justified because some rather obvious safety management system weaknesses existed. Why did she react prior to having the facts? Improvement: Design and conduct management and employee training on safety accountability criteria.

These were not all the system failures: just a few examples. Given more background information and analysis, other important system failures would also be discovered throughout various levels of staff and line management. These and other failures support the position that employee discipline was not justified in this scenario. Remember, if the system has somehow failed the employee, discipline is NOT justified. In fact, the appropriate response, one that demonstrates real leadership, is to apologize to the employee and make a commitment to fix the system.

4. Which of the following responses is appropriate if you find safety management system weaknesses in your analysis of an accident or non-compliant behavior?
   
   a. Place blame most frequently on management
   b. Assume the common-sense justification
   c. Apologize and commit to fix the system
   d. Reduce the severity of the discipline

**Element 1: Formal Standards of Performance**

OSHA has developed rules in occupational safety and health that are standards of performance for employers. Employers are required to, likewise, establish their own standards that includes safety programs, plans, policies, processes, procedures, practices, job descriptions, and rules. Employers must clearly convey these safety standards of performance to employees by doing the following:

- Make sure safety policies and disciplinary procedures are clearly stated in writing and made available to everyone.
• Educate all employees, both management and labor, on these policies and procedures.

• Make sure employees certify they have read, understood, and will comply with those safety policies and procedures.

• Do this when they are hired, and annually thereafter.

If standards of acceptable behavior and performance are not established and clearly communicated to employees, an effective accountability system is impossible. Management may not be justified in administering discipline without clearly written and communicated standards.

5. Make sure safety policies and disciplinary procedures _____.
   a. are revised frequently and posted
   b. focus on employee-level compliance
   c. are enforced with swiftness and publicized
   d. are clearly stated in writing

Element 2: Adequate Resources and Psychosocial Support

Before employers are justified in administering appropriate consequences, they should first provide their employees with the means and methods to achieve the standards of performance that have been established. Employers should provide a safe and healthful physical workplace and supportive psychosocial workplace environment.

• Physical resources: Helps to ensure safe and healthful conditions and exposures. Examples include safe tools, equipment, machinery, materials, workstations, facilities, and environment. State and Federal OSHA agencies emphasize this category.

• Psychosocial support: The prevention of psychosocial stress is closely linked to the promotion of a healthy work environment. Stress normally refers to feelings of strain, tenseness, nervousness and reduced feelings of control. Stress takes our mind off the work we're doing and increases the chance of being injured or ill.

Examples of psychosocial factors that increase stress include job dissatisfaction, monotonous work, pressure to work fast, limited job control, and lack of positive consequences.

Examples of ways to support the psychosocial environment that reduce stress include:
• effective safety education and training,
• reasonable work schedules and production quotas,
• human resource programs,
• safe work procedures,
• competent management, and
• tough-caring leadership.

6. Which of the following is a good example of psychosocial support to improve employee compliance behaviors?

   a. Prioritizing safety policies
   b. Reasonable work schedules and production quotas
   c. Continual observation and evaluation by supervisors
   d. Making hazardous work voluntary

Element 3: A System of Performance Measurement

Once again, when applied to safety behavior and performance, being held accountable demands more than simply being answerable. In an effective accountability system the quality or level of safety performance is measured regularly and often. Measurement processes include informal/formal observations. However, effective measurement means more than merely observing behaviors. It also includes quantifying behaviors and activities - adding up the numbers. Those numbers, called Key Performance Indicators, form the statistics that you can use to improve the safety management system.

Key Performance Indicators Up and Down the Organization

Examples of measured safety behaviors and performance at various levels include:

Top/mid-level managers: Unfortunately, measurement at this level typically includes lagging indicators or results statistics over which top managers actually have little direct control. It's hard to control something, like an accident, that has already occurred. These measures include:

• accident rates
• experience modification rate (MOD Rate)

• workers' compensation costs

This situation may cause top managers to put pressure on supervisors to hold down the number of accidents in their departments. Consequently, the result may be ineffective measurement at all levels. Leading indicators measure performance that occurs before an accident. They are more proactive and beneficial because they help to prevent future accidents. Appropriate leading indicator behaviors and activities to measure at top/mid-level management include:

• Involvement in safety management system formulation and implementation;

• Developing effective safety policies, programs, procedures;

• Arranging management/supervisor safety training;

• Providing physical resources and psychosocial support;

• Involvement in safety education/training;

• Supporting involvement in the safety committee.

7. Why are lagging indicators less valuable than leading indicators as performance measures?

   a. Lagging indicators are less numerous than leading indicators
   b. Leading indicators are better at measuring events reactively
   c. Lagging indicators do not give an accurate picture of what happened
   d. Managers have little direct control over lagging indicators

Supervisors: Supervisors may not be able to completely control the results (such as the accident rate) of their work area. However, they do have the ability to control their own safety management and leadership activities. Therefore, to hold supervisors accountable, performance measurement at this level should primarily include proactive supervisor safety behaviors and activities such as:

• making sure workers have safe materials, tools, equipment, machinery, etc.
• ensuring a healthful psychosocial environment
• following company safety rules
• conducting safety inspections
• enforcing safety rules
• training safe work procedures
• recognizing employees for safety
• conducting safety meetings

Employees: Measurement of employees should include appropriate proactive personal behaviors such as:

• complying with company safety rules
• reporting injuries immediately
• reporting hazards
• making suggestions
• involvement in safety activities

After all is said and done, if the behaviors and activities above are expected and recognized, the results that we all worry about will take care of themselves. Improve the process and watch the outcome follow!

8. Which of the following is an effective key performance indicator that should be measured?
   a. The number of accidents in the department
   b. The number of safety inspections conducted
   c. Workers' compensation rates in the department
   d. Number of days without a serious injury

Appropriate Accountability

A basic rule for developing accountability criteria for measurement is that an employee should be held accountable for a responsibility only if they have been given adequate:
1. time,

2. authority,

3. resources, and

4. ability to fulfill responsibilities.

If managers and employees are being measured and held accountable for results over which they have no control, they will attempt to somehow gain control over the results. The attempt to establish control may include inappropriate strategies.

For example, a supervisor who's measured only on department accident rates may threaten to fire anyone who completes an OSHA 301, Incident Report. Not only is that behavior counterproductive for the company, it is illegal!

OSHA assumes the employer ultimately controls all of the many operational variables such as raw materials, equipment, machinery, work schedules, personnel, and policies that make up the day-to-day work environment. Therefore, employer performance in providing resources and implementing policies, etc., should be measured.

On the other hand, employees may have very little control over operations in the workplace. However, they do have control over their own behavior: Employees have the ability to choose to work safe or to take chances.

In the workplace, managers should measure supervisor activities and behaviors, and it's important that supervisors measure their employees' safety behaviors. Employees can choose to comply with safety rules, and they may choose to report injuries and hazards in the workplace. Consequently, we need to measure these personal behaviors.

OSHA doesn't merely observe, they inspect, investigate, and issue citations that may include monetary penalties: Now that's measurement with consequences, isn't it?

OK, we've looked at Elements 1-3 of the accountability program. Now let's head over to Module 2 to check out Elements 4-6.

9. An employee should be held accountable **only** if he or she has been _____.

   a. provided time, authority, and resources
   b. trained, warned, and know expectations
c. not allowed to fail in any of their duties

d. been given a list of expectations

Module 2: Consequences and Evaluation

Element 4: Application of Effective Consequences

What is a Consequence?

A "consequence" is anything that occurs as a result of something that happens. Another way to express it is to think it in terms of cause and effect: the initial behavior is the "cause" and the consequence is the "effect." For every cause, there is an effect. The effect may be something that affects you internally, externally, or both.

In each example below, the initial behavior or action is the cause: the reaction or response is the effect or consequence. Let's look at some examples:

- You don't pay attention when pounding a nail (cause), **SO** you hit your thumb with the hammer, and it hurts. (effect)
- You don't think safety is important, **SO** you get injured taking an unsafe shortcut on the job.
- Your supervisor sees you take an unsafe shortcut, **SO** he gives you a written warning.

Is there any escape from consequences?

Not in the workplace. It's important to understand there is no such thing as "no consequence" for an action. You cannot NOT have a consequence. For instance, if a supervisor thanks a worker for making a safety suggestion, the supervisor's recognition is a consequence (positive). If the supervisor ignores the worker who made the safety suggestion, the "act" of ignoring is also a consequence (negative).

Effective consequences increase desired behaviors or decrease undesired behaviors.

If employee safety performance meets or exceeds the standards set by the employer, you know consequences are effective. When employees meet or exceed performance standards, some sort of positive recognition should follow. On the other hand, if employees make informed choices not to comply with the company's safety performance standards, some sort of appropriate corrective action should follow.

Every cause has an effect.
1. How can you tell when a consequence has been effective?

   a. Employees behave when being supervised
   b. Employees work only to stay out of trouble
   c. Employees take shortcuts when unsupervised
   d. Employees meet or exceed performance standards

### Positive and Negative Reinforcement

There are various strategies for administering positive and negative consequences. Careful planning is critical to ensure consequences are effective. So, let’s first take a look at positive and negative reinforcement, and why positive reinforcement is best in producing a world-class safety culture.

#### Positive Reinforcement

Positive reinforcement is the use of consequence strategies that attempt to increase the frequency of desired behaviors through positive recognition and/or reward. Consequences for safe behaviors that meet or exceed expectations should include some form of positive recognition and/or reward. Consequently, workers will believe that if they do something well, they will get recognized.

Important criteria to remember about positive reinforcement include:

- It will increase desired behavior and employees may work far beyond mere compliance.
- The desired behaviors may actually be safe or unsafe. If the desired behavior is to work fast, employees will prioritize working fast, not necessarily safe.
- Workers may perform far beyond minimum standards - discretionary effort.
- If the desired behavior is to work safe, no matter what - it's a value-based safety strategy.
- If the desired behavior is to work fast, not necessarily safe - it’s a priority-based safety strategy. Safety may be prioritized below production.
- This strategy is more effective if the goal is to achieve a world-class safety culture.

It's important to know "desired" behaviors may not always be safe behaviors. Unfortunately, this may be true in safety cultures where it is more important to work fast than safe. In this
instance, working fast and not safe is top priority. This is especially true when the employer is under pressure to finish a project on time. Here are some examples showing how perceived positive reinforcement can increase both safe and unsafe behaviors:

- Your supervisor thanks you, if you comply with all the safety rules.
- Your supervisor gives you time off, if you take safety shortcuts to get work done ahead of schedule.

2. Which strategy may result in performance far beyond mere compliance?
   a. Ignoring performance
   b. Positive reinforcement
   c. Negative reinforcement
   d. Zero tolerance for error

**Negative Reinforcement**

Negative reinforcement is the use of consequence strategies that attempt to increase the frequency of desired behaviors by withholding negative consequences. Workers will believe if they do something the employer wants, they will avoid negative consequences. If safety is what the employer wants, these strategies will be less effective because workers are generally only trying to do what is necessary just to "stay out of trouble". Important criteria of negative reinforcement include:

- Workers perform only to avoid the perceived negative consequence - nothing else.
- The desired behavior may actually be safe or unsafe.
- The intent is to increase desired behaviors by withholding an unwanted consequence.
- Workers perform to minimum standard but not beyond: just enough to stay out of trouble.
- The focus is on compliance, not excellence. - it's a fear-based strategy.
- This strategy is less effective if the goal is to achieve a world-class safety culture.

Once again, the outcome is dependent on the behaviors that the employer actually wants. Hopefully, the employer prioritizes safety, but that's not always the case. Here are some
examples that show how perceived negative reinforcement can increase both safe and unsafe behaviors:

- If you comply with safety rules, the supervisor says you won't be reprimanded.
- If you take safety shortcuts to get work done ahead of schedule, your supervisor does not get upset.

3. Which of the following is the strategy to increase desired behaviors by withholding negative consequences?

   a. Positive punishment
   b. Positive reinforcement
   c. Negative reinforcement
   d. Negative punishment

**Positive and Negative Punishment**

**Positive Punishment**

This is a little hard to figure out. How can punishment be positive? Positive punishment occurs when a worker's safety behavior or performance results in a perceived negative consequence that serves to decrease the probability of that behavior in the future.

For instance, a supervisor might yell at a worker who is violating safety rules. If the worker stops violating safety, the supervisor ceases yelling. The supervisor's yelling serves as a positive punishment because the supervisor adds an unpleasant response in the form of yelling.

**Negative Punishment**

Negative punishment occurs when a worker’s behavior or performance results in the removal of a perceived positive consequence. Removal of the consequence decreases the probability of that behavior in the future. For instance, the supervisor withholds positive recognition if workers do not achieve certain standards of behavior or performance.

**Why Recognition Programs Fail**

Both positive reinforcement and negative punishment occur in safety recognition programs that reward one employee for being first, best, or most improved. At the same time the one winner receives positive reinforcement, everyone else receives negative punishment because
they are, in fact, losers. Everyone else may have performed quite well, but since they were not the best, positive recognition is withheld. The result is one winner and many losers.

Recognition programs that reward only the best performer can actually demotivate most workers. This form of negative punishment is one of the primarily reasons safety recognition programs do not work. The best strategy is a recognition program that is criterion-based and recognizes everyone who meets the criteria for recognition. The goal is to have many winners who all meet or exceed management expectations.

4. What is the best strategy to ensure your recognition is most effective?

   a. Recognition is criterion-based - create many winners
   b. Recognition is merit-based - create one winner
   c. Recognition is universal - everyone wins
   d. Recognition is withheld - only good employees win

Ignoring

Ignoring, intended or unintended, is actually a common form of negative punishment. You might think ignoring employee behaviors is actually withholding a consequence. No such luck. Every response, including ignoring, is a consequence. In fact, ignoring desired behaviors in the workplace is usually the least effective consequence because it leads to extinction of those behaviors. Think about it. Have you ever been ignored when you thought you should have been recognized? I bet you were upset. And it didn't matter why you were ignored either: you didn't like it. So, let's take a look at some of the characteristics of extinction:

   • It is the withdrawal of recognition;
   • The worker is ignored and no matter what, desired behavior becomes less frequent. For instance:
     
     o If workers breaks safety rules and a supervisor ignores it, the worker may perceive this as a positive consequence and will less likely behave safely in the future.
     
     o If workers complies with safety rules and this is ignored, the worker may perceive it as a negative consequence and will more likely break safety rules in the future.
• Workers eventually perform without an expectation of recognition.

• No relationship with management exists.

• It is the most common form of consequence in the workplace - It's epidemic in organizations.

• Examples of the thoughts and beliefs produced when people are ignored include:
  o "It doesn't matter how hard I work around here."
  o "Apathy is rampant, but who cares."

5. What is the most common form of negative consequence of desired behaviors in the workplace?
   a. Punishing performance
   b. Negative reinforcement
   c. Positive reinforcement
   d. Ignoring performance

Element 5: Appropriate Application of Consequences

Without the expectation of consequences, accountability has no credibility and will not be effective. In other words, no consequences - no accountability. Consequences need to be appropriate as well as effective. This is the element with which everyone is probably most familiar. Unfortunately, in some companies, consequences are either not appropriate, not effective, or both.

Criteria for Appropriate Consequences

• They are justified.

• They correspond to the degree of positive or negative results of the behavior.

• They are applied consistently throughout the entire organization.
Justified Consequences

Negative consequences are justified when the person administering discipline has fulfilled their own accountabilities first. Positive consequences are justified any time employees meet or exceed expectations. Here's an important principle (I call it the 5-R principle): The more Regularly you Recognize and Reward, the more Rarely you'll have to Reprimand.

6. What must occur FIRST for supervisors to be justified in disciplining for unsafe performance?
   a. Supervisors must prove they are right
   b. Supervisors must fulfill their own accountabilities
   c. Supervisors must show the employee did not use common sense
   d. Supervisors must indicate intent on the part of the employee

"Five Stars" Leadership is the Key

It's critical to understand that before administering progressive discipline, managers and supervisors exercise real leadership when they first ask five important questions to how well they have fulfilled their own obligations to employees. Doing this is important to make sure they are actually justified in administering corrective actions. The negative impact on the company if employees are disciplined inappropriately can be dramatic over time.

The good news is that determining if discipline is appropriate doesn't have to be difficult. When conducting a self-evaluation, managers and supervisors can use the "STARS" acronym to the right to help them remember their five basic safety obligations to employees. Let's take a look at each of the five obligations:

1. **Supervision**: By definition, adequate supervision means "detecting and correcting hazards or unsafe behavior before they cause an injury or illness." If supervisors are stuck in the office all day, it's not possible to oversee the work employees are doing. Lack of supervision is a major reason disciplining employees after an accident is usually inappropriate. Managers and supervisors should ask, "Did I catch them violating safety rules before they got hurt?"

2. **Training**: Employees must be provided with the required knowledge and gain the skills to comply with safety requirements. Employees, then, have the necessary knowledge and skills to understand the natural and system consequences of noncompliance.
Managers and supervisors should ask, "Have I provided (or has the employee received) quality safety training?"

3. **Accountability:** Do employees believe they will be disciplined if they're caught violating safety rules? Or, do they know that all you will do is shake your finger and threaten them without following through. If supervisors allow employees to violate safety rules, all justification for discipline disappears. Managers and supervisors should ask, "Have I applied safety accountability fairly and consistently in the past?"

4. **Resources:** Do employees have the physical resources and psychosocial support to comply with safety requirements? Supervisors need to provide adequate tools, equipment, materials that make it possible for employees to work safely.

5. **Support:** Supervisors should also manage workloads, schedules, employee relations so that the workplace is as stress-free as possible. When the employee believes working fast is more important than working safe, supervisors are failing in this area. Managers and supervisors should ask, "Have I provided the employee with a safe and healthful workplace?"

If managers and supervisors can honestly answer "**YES**" to each of the above five questions, it may be appropriate to administer discipline because the five basic leadership obligations have been fulfilled. However, if they cannot honestly answer "yes" to each question, then an apology would be in order, and a promise to make personal and system improvements (provider better training, resources, expectations of enforcement, supervision and leadership).

**7. If a new employee is caught, during his first day at work, wearing the wrong type of PPE while performing a hazardous task, which of the following supervisor accountabilities is least likely to have been fulfilled?**

   a. Adequate psychosocial support
   b. Adequate supervision
   c. Adequate physical resources
   d. Adequate PPE training
How Severity and Responsibility Affect Consequences

- **Severity:** Consequences should increase with the severity of the potential injury or illness that might result from the behavior. If an employee is performing an unsafe work practice that could result in a fatal injury to himself or another employee, that certainly warrants a severe consequence. On the other hand, an employee who performs a behavior that violates a safety rule, yet will not result in an injury or illness, a less severe consequence is more appropriate.

- **Responsibility:** Consequences should increase with the level of responsibility of the person performing the behavior. If an employee neglects to perform a safe work practice such as wearing ear protection, a safety rule has been violated and discipline may be in order. However, if a supervisor or manager neglects to wear the ear protection, we're not just talking about violating a safety rule. That safety rule has, in effect, been legally transformed from a mandatory requirement into a discretionary guideline. Consequently, as a guideline, it is not legally auditable or enforceable.

In the examples above, a more severe level of discipline would be in order for the supervisor because the supervisor, in effect, gives permission for all employees to violate the safety rules. Consequently, the negative impact on the safety of employees has the potential to be much greater when the supervisor violates a safety rule.

On the other hand, if a supervisor or manager does something positive, the net impact will likely be greater than that of one of his or her employees. Consequently, more significant positive consequences would certainly be appropriate.

Consistent Application of Consequences

Consequences are applied consistently at all levels of the organization.

To build a high level of trust between management and labor, accountability must be applied consistently at all levels of the organization: up and down, and across functions. Every supervisor and manager must be held accountable in the same fair manner consistent with employees. If labor perceives the accountability system as applying only to them, they will naturally consider it unfair: the primary failure mode for accountability systems.
8. What occurs when a supervisor ignores an employee who fails to follow fall protection rules when required?
   a. The mandatory rule becomes discretionary guideline
   b. The supervisor becomes the agent of the employer
   c. OSHA may not cite the employee for violations
   d. Top management criminally cited by OSHA

Element 6: Continuous Evaluation of the Accountability System

Evaluation of the accountability system, as with all systems should be a continuous process. Although as a supervisor you may not be responsible for formally evaluating the accountability system it's good to know that someone is. Usually, the safety coordinator and/or safety committee are involved in this activity. In some "state-plan" states, like Oregon, the safety committee is required by law to conduct an evaluation of the employer's accountability system.

The process usually involves three levels of activity:

- **Identification**: Inspect the accountability system policies, plans, procedures, processes to identify what exists.

- **Analysis**: Dissect and thoroughly study each accountability system policy, plan, procedure, process to understand what they look like.

- **Evaluation**: Compare and contrast each accountability system policy, plan, procedure, process against benchmarks and best practices to judge their effectiveness.

Evaluating for Accountability

OSHA looks primarily for two program elements when evaluating an employer for accountability: Policy and consequences. OSHA does not mandate or require specific recognition/disciplinary procedures: That's the responsibility of the employer. But, an effective accountability policy that is written and clearly communicated should be in place. Make sure your company has a written policy that addresses accountability including the three key components.

- specific performance expectations
- who is accountable - both management and employee
• appropriate consequences such as progressive discipline

If you believe there are weaknesses in your employer's accountability system, make sure to take notes on the behaviors and conditions you see in the workplace that may be pointing to accountability system policies, plans, processes, and procedures that are inadequate or missing.

9. When should evaluation of the Safety Accountability Program occur?
   a. At least annually
   b. After a serious accident
   c. Continuously
   d. As needed
Additional Resources

- OSHA Safety and Health Program Management Guidelines, OSHA
- Field Operation Manual, OSHA
- OSHA 2254, Training Requirements in OSHA Standards and Training Guidelines, OSHA
- OSHA Safety Pays, OSHA
- Foundation for a Safe Workplace, Oregon OSHA