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## Effective Safety Supervision

This material is for training purposes only. Its purpose is to inform Oregon employers of best practices in occupational safety and health and general Oregon OSHA compliance requirements. This material is not a substitute for any provision of the Oregon Safety Employment Act or any standards issued by Oregon OSHA.

# MODULE FIVE: ENSURING SAFETY ACCOUNTABILITY

## Introduction

The supervisor, as an agent of the employer, is charged with carrying out a very important responsibility; that of holding employees accountable for their actions. And, of course, the supervisor is assigned responsibility and held accountable for carrying out this very important leadership activity.

When you have authority or responsibility, your performance is not necessarily evaluated. But when you are held accountable, your performance is evaluated in relation to standards or goals that result in certain positive or negative consequences. Let's take a look at some definitions:

- Authority - exists when a person has been assigned power or the right to command, act
- Responsibility - exists after authority has been assigned. Obligates those in authority to carry out assigned duties
- Accountability - exists when performance of assigned duties is evaluated against standards and the performance results in consequences

"...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

## What do OR-OSHA standards say about accountability?

The actual term "accountable" is nowhere to be found in OAR 437, Division 1, Rule 760, Employer and Employee Responsibilities. However, the concept is discussed. Let's take a look below.

**ORS 654.022 Duty to comply with safety and health orders, decisions and rules.**

Every employer, owner, employee and other person shall... do everything necessary or proper in order to **secure compliance** with and observance of every such order, decision, direction, standard, rule or regulation. ("Secure compliance" means the employer is enforce mandated safety policies and rules.)

**437-001-0760 Rules for all Workplaces.**

**(1) Employers' Responsibilities...**

(b) The employer shall take all reasonable means to **require** employees to... (Here we see that the employer must require, not encourage, compliance.)

(A) To work and act in a safe and healthful manner;

(B) To conduct their work in compliance with all applicable safety and health rules;...

**The accountability principle**

**Accountability follows control.** A basic rule of thumb for any accountability system states that, "a person should held accountable for a responsibility only if that person has the ability to fulfill that responsibility."

**What the employee is typically not authorized to control: Partial list**

- Quality/safety of the materials
- Design of the equipment
- Quality/safety of raw materials
- Quality/safety of tools
- Workstation design
- Air quality
- Temperature
- Humidity
- Noise level
- Coworkers, supervisors, managers
- Time
- Workload
- Schedule
- Level of training
- Frequency of the task
- Duration of the task.

**What actions does the employee have control of?**

Personal safety behavior. That's about all you have. Employees have control, or the ability to choose, when it involves their own individual behavior. These include:

- Complying with company safety rules.
- Reporting hazardous conditions and unsafe practices.
- Reporting injuries as soon as they occur.
- Warning other employees.

### What about "control" on multi-employer worksites?

A committee of stakeholders, including union and business, and Oregon OSHA staff worked together for many years to provide the following guidelines to help employers understand their accountabilities on a multi-employer worksite.

**Excerpt from  
Multi-employer Workplace Citation Guidelines  
Effective January 1, 2003**

**I. SCOPE**

These guidelines constitute directions to compliance officers on how to issue citations at multi-employer worksites. They do not preclude inspections to determine whether or how to issue appropriate citations. They do not constitute rules, policies, or statements of rights. The guidelines have general application to owners, general contractors and sub-contractors on any multi-employer worksite that have a direct (e.g., general contractor to subcontractor) or indirect (e.g., subcontractor to subcontractor, owner to subcontractor, etc.) contractual relationship to one another. These guidelines shall not supersede responsibilities set out elsewhere such as those in the Hazard Communication Standard, etc.

**II. DEFINITIONS:**

1. "Control": An employer will be determined to have sufficient control to abate hazardous conditions on a multi-employer worksite when it either (1) has a direct employment relationship with an employee exposed to the hazard; or (2) has the authority to direct, or actually directs, how other employers and/or their direct employees are to safety accomplish their specific job tasks.

Exceptions:

(i) An employer does not have control, as defined herein, if it did not create the hazardous condition that violates OR-OSHA regulations unique to another employer's specialty occupation, unless it had knowledge of the hazardous condition for a reasonable period.

(ii) "Control" sufficient to abate a violation cannot be based solely on an employer's right to terminate or suspend work to correct unsafe working conditions, nor on an employer's authority to remove another employer's employee from the site for nonconformance with OR-OSHA regulations or other safety plans or obligations.

2. "Knowledge": An employer on a multi-employer worksite will be determined to have knowledge of the existence of a hazardous condition if the employer had actual knowledge or with the exercise of reasonable diligence could have known

for a reasonable period of a condition or practice at the worksite that constituted a safety or health hazard.

Exception: Under no circumstances will an employer be determined to have knowledge of hazards related to violations unique to another employer's specialty occupation unless the first employer had knowledge of the hazardous condition for a reasonable period.

3. "Reasonable period:" A brief period of time that, with the exercise of due diligence, would allow the employer to take appropriate steps to have the safety or health hazard abated or exposure to the hazard eliminated.

## What is an accountability system?

We're all familiar with the term, accountability, but many of us do not really understand what an accountability system is. There are six critical elements to an effective accountability system. Each of these elements should be well designed and carried out, or the accountability system is may ultimately fail.

### Element 1: Established performance standards

Established standards inform everyone about expected levels of performance and behavior. Standards of performance should be in writing and clearly stated so that everyone understands. Examples of standards include: written plans, policies, procedures and rules.

### Element 2. Resources to achieve those standards

The employer is not justified in administering progressive discipline unless employees are provided with the necessary resources to achieve established standards.

What resources are necessary? That depends on the task, but generally employees need and want:

- Safe tools, equipment, machinery, and materials so that they can safely produce or provide the highest quality product or service.
- A healthful physical environment that ensures minimum exposure to extremes in noise, toxic chemicals, hazardous atmospheres, and temperatures.
- A healthful psychosocial environment that minimizes distress by making sure employees have adequate control over the various aspects of their work life. Examples are: training, reasonable workloads, work schedules, employee assistance programs.
- Healthful relationships with coworkers and management. Tough-caring leadership is most effective.

### Element 3. A system of performance measurement



Once performance standards are established, policy and procedures should be developed to measure employee and manager performance against those established standards. You're probably familiar with the system OR-OSHA uses to measure your employer's safety performance. They conduct workplace inspections.

**Employees.** The most common method to measure employee safety behavior and performance is for the supervisor to randomly observe the behavior in the workplace. It is very important that supervisors regularly oversee work activity. Done properly, the supervisor may offer valuable feedback on the spot, and possibly prevent injury to the employee. Other companies also employ co-worker or peer observations to continually monitor and correct unsafe work practices. Supervisors should be careful to measure behaviors that employees have the ability to control.

It's inappropriate to evaluate an employee solely for the number of accidents they might have. You might wonder why. Well, an employee can comply with all safety rules and still get hurt. On the other hand, they can violate safety rules and, by being lucky, not get hurt. Whenever an accident happens, their isn't usually one simple cause. In most instances multiple causes exist that are outside the control of the employee.

Assessment (to determine if hazardous conditions exist and correct procedures are being used) and evaluation (to judge the effectiveness of safety procedures) are important components to a system of measurement.

What are the general employee safety behaviors that supervisors and managers should measure? Do they look familiar?

- **Complying with company safety rules.** Meeting the employer's expectation in work conduct.
- **Reporting workplace hazards.** As soon as possible to the supervisor and safety committee representative.
- **Reporting workplace injuries immediately.** No matter how minor. To minimize the negative impact on the employee and company.

**Supervisors and Managers.** Naturally, supervisor and manager safety behaviors should be evaluated in the same manner as with employees. Again, activities should be measured, not results (the number of accidents). For instance, a supervisor may be exceeding corporate expectations in safety behavior, yet still suffer accidents in his or her area of responsibility.

What corporate safety activities should the employer expect from supervisors and managers?

- **Providing safe work and a safe workplace.** Safe work includes writing and implementing safe operating procedures (SOP's). A safe workplace includes safe materials, tools, equipment, facilities and environment within their area of responsibility.
- **Providing effective safety oversight.** Regularly inspecting work being done. Remember, the definition of "adequate supervision," is detecting and correcting hazards before they result in injuries.
- **Providing effective safety training.** Hands-on demonstration on the job.

- **Holding employees accountable** for safety. Fairly and consistently applying consequences. Employees *expect* consequences.

## Element 4. Application of Effective Consequences

### Effective consequences increase desired behaviors.

Effective consequences have the effect of increasing the frequency of desired behaviors. If employee safety performance meets or exceeds the standards set by the employer, some sort of recognition should follow. On the other hand, if the employee makes an informed choice not to comply with the company's safety rules, some sort of appropriate corrective action should follow. There are various strategies for administering positive and negative consequences. Careful planning is critical to ensure consequences are effective.

### Every culture is a culture of consequences

As a supervisor it's important to know that you are the primary creator of the "culture of consequences within your work group. After all, you have more influence (control) than any other person in your department to affect behavior. Let's take a look at three basic approaches that each create very different consequence cultures.

**Positive reinforcement** - If we do something well, we get rewarded.

- When effective, increases desired behavior
- Worker performs to receive a positive consequence
- Worker may perform far beyond minimum standards - discretionary effort
- Focus is on excellence - success based motivation
- "If you report a hazard, you will be recognized"
- "If you prevent an injury or save money, you will be rewarded"

**Negative reinforcement** - If we do something well, we don't get punished.

- Intent is to increase desired behavior. Can be successful when only looking for compliance.
- Worker performs to avoid the consequence
- Worker performs to minimum standard - just enough to get by
- Focus is on compliance - fear based motivation
- "If you comply with safety rules, you won't be punished"

**Absence of reinforcement** - No matter how well we perform, we're ignored.

- Withdrawal of negative/positive reinforcement
- Very effective in extinguishing desired behaviors
- Worker eventually performs without expectation of consequences (other than wages)
- Person is ignored - no relationship with management
- Is epidemic in organizations - the most common consequence occurring in the workplace
- "It doesn't matter how hard I work around here"
- "Apathy is rampant, but who cares"

## Soon, Certain, Significant, Sincere

In all instances, to be effective, disciplinary action and positive recognition/reward should be:

**Soon** - To be most effective, the consequence should be administered soon **after** evaluation validates justification. If the employee fails to comply with safety standards, discipline is most effectively administered only after a thorough evaluation of the safety management system determines it is justified. If the employee is being recognized for meeting or exceeding expectations, the positive consequence is most effective when it occurs very soon after the behavior is exhibited.

**Certain** - The employee needs to understand the specific behavior that resulted in the consequence. Discipline is not as effective when administered for "poor attitudes," or lack of "common sense." Specific behaviors should be addressed. On the other hand, positive recognition is least effective when it's based on just being lucky. Drawings and other forms of safety games are generally not as effective as recognition based on criteria.

**Significant** - Consequences do not change behaviors unless the employee perceives them as important. The significance of a consequence is determined by the receiver. A verbal warning may not be effective for all employees. A mug or hat as a reward may not be considered significant to some. It all depends.

**Sincere** - Appropriate motives for administering discipline and awarding positive recognition are all-important to the effectiveness of a consequence. If the receiver thinks consequences are the result of self-serving motives (to make the supervisor look good, keep the supervisor out of trouble, etc) they will not be considered genuine. The reason for the discipline is to make sure the employee (a very important asset) stays safe by using safe procedures and practices. It's not wise for a supervisor to tell the employee they are disciplining because they "have to because it's policy." This message tells the employee the supervisor is disciplining to stay out of trouble: Not a tough-caring leadership message.

### Positive recognition pays big dividends...

When an employee meets or exceeds expected standards of safety behavior they need to be "praised" for it in some way. Here are some ideas for supervisors:

#### Complying with safety rules.

- A simple "Safety Hero" certificate for complying over a number of years.
- An entry into the "professional performance" section of the employee's performance appraisal.
- Safety bucks. When you catch someone doing something right!
- Formal recognition by the CEO (not some mid-level manager) for sustained professional performance.

#### Reporting hazards in the workplace.

- The ideas above.
- A bonus equal to a percentage (1% or so) of the direct accident cost the company

might have realized had the employee not reported the hazard and an accident occurred.

**Reporting incidents/injuries in the workplace.**

- A simple "thank you," followed by an analysis of the incident/accident to eliminate the hazard or unsafe behavior that caused it (that's leadership!).

Supervisors and managers, as employees, should be recognized for the above behaviors too. They should also be recognized for the additional four corporate behaviors for which they are accountable: 1. providing adequate physical and psychosocial resources, 2. effective oversight, 3. quality training, and 4. applying consequences. In addition to the ideas above:

- An improved benefit package.
- Improved standing for corporate advancement.

**Remember the "Five-R" Principle**

If you Regularly Recognize and Reward, you'll Rarely have to Reprimand.

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. Focus on measuring activities rather than outcomes. Improve the process and watch the outcome follow! This may all appear to be "pie in the sky": But it doesn't have to be. Put these ideas to the test. Now let's take a look at some real-world problems related to this element.

**Do the right thing: That's leadership... Do the thing right: That's management!**

Most employers establish safety incentive programs to increase awareness and influence behaviors in a positive direction. However, some employers make the mistake of rewarding employees for working injury-free for a period of time. What's wrong with that? They unknowingly reward employees for **withholding incident and accident reports**. The employer's intent is to do the right thing, but the problem is that they're not doing the thing right.

Although the company may be able to boast of thousands of production hours without a reported injury, some of their employees may actually be injured or ill. (The "walking wounded" syndrome.) Why does this happen? Negative peer pressure, the desire to "win", or other workplace factors may cause the employee to decide not to report their injury or illness.

**Element 5. Appropriate application of consequences**



Without the *expectation* of consequences, accountability has no credibility and will not be effective. No consequences...no accountability. To build a high level of credibility in consequences and trust between management and labor, consequences must be applied consistently and fairly at all levels of the organization.

**Evaluate your own performance first**

It's important that , **before** administering progressive discipline,

supervisors self-evaluate how well they have fulfilled the obligations they have to their employees. Doing this is important to make sure they are actually justified in administering corrective actions.

## When is it appropriate to administer discipline?

Determining the appropriateness of administering negative consequences does not have to be difficult. Before a supervisor administers discipline, he or she should first evaluate their own performance by asking some important questions:

1. Have I set the proper example by complying with all safety rules?
2. Have I provided the employee with a safe and health workplace?
3. Have I provided adequate safety oversight?
4. Have I provided (or has the employee received) quality safety training?
5. Have I applied safety accountability fairly and consistently in the past?

If a supervisor can honestly determine he or she has met these obligations to the employee, it is probably safe to assume it's appropriate to administer discipline. If a supervisor cannot honestly answer each question in the affirmative, it's probably more appropriate to determine what safety system weaknesses exist so that they can be improved.

When an employee suffers an injury, the question of discipline is most appropriately deferred until a qualified person (usually the safety manager) conducts a thorough root cause analysis to determine if design and/or implementation failures exist within the safety management system.

## Negative consequences can be a positive step in the right direction

To make sure unsafe or inappropriate behaviors do not persist in the workplace, some form of negative consequences may be required. The most common process, called "progressive discipline," can actually be a very positive intervention for both the supervisor and employee when the proper motive is effectively communicated. Usually progressive discipline procedures apply increasingly more significant consequences if the unwanted safety behavior continues.

**Please note that Oregon OSHA does not mandate this or any other plan for progressive disciplinary procedures. This is just one of many plans used commonly by employers.**

## Element 6. A process to evaluate the accountability system.

Although, as a supervisor, you may not be responsible for actually evaluating the accountability system, it's good to know that someone is. Usually, the safety coordinator and safety committee are involved this activity. In Oregon, the safety committee is required by OAR 437 Div. 1 Rule 765 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. The devil is in the detail.

- **Evaluation.** Compare and contrast the system against known best practices to judge their effectiveness.

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 failures.

## Final Thoughts

Accountability is an extremely important element in the safety and health management system. Having a firm understanding of the concept and program will help ensure success. Well, it's time to take the last module quiz. If you have difficulty answering the questions, just scroll back up the page and study the section related to the question.



### Module 5 Review Quiz

41. Employees are appropriately held accountable for all of the following behaviors, except?
- Reporting hazards in the workplace
  - Working injury-free throughout the year
  - Reporting injuries
  - Complying with company safety rules
42. When you are held accountable, your performance is evaluated in relation to standards and that performance results in consequences:
- True
  - False
43. According to the text, accountability is defined as:
- Evaluating performance and administering consequences
  - The obligation one has to perform
  - Being answerable for your actions and performance
  - Being able to give people the right answers
44. Which of the answers below is the most appropriate response when an employee reports a hazard?
- Be careful!
  - Thanks! Let's see how that happened
  - Thanks! Tell the safety manager about it
  - Report it to the safety committee
45. Which of the following is not described as an appropriate question for the supervisor to ask when considering disciplinary action?
- Have I provided the needed resources?
  - Have I properly trained the employee?
  - Have I intervened at least three times?
  - Have I complied with the safety rules?

46. When trying to get employees to comply with safety rules, which approach works best?

- a. negative reinforcement
- b. negative and positive reinforcement
- c. positive reinforcement
- d. absence of reinforcement

47. According to the text, accountability follows \_\_\_\_\_:

- a. training
- b. control
- c. assignment
- d. responsibility

48. The employer is justified in administering progressive discipline even if employees are not provided with necessary resources.

- a. True
- b. False

49. When an employee suffers an injury, the question of discipline \_\_\_\_\_:

- a. is addressed immediately, usually the same day
- b. is raised after surface causes are determined
- c. is never appropriately addressed
- d. is raised only after root cause analysis

50. Oregon OSHA mandates specific progressive disciplinary procedures in OAR 437, Division 1, Rule 760.

- a. True
- b. False

Good job. That's it for this course! I hope you have gained a greater awareness of your responsibilities in occupational safety and health, and how to carry them out.

**Congratulations on completing module five!** If you haven't been working on the course assignments yet, now is the time to download the assignments page to draft your responses. I hope the information within these five modules as been helpful to you and I hope to see you participate in another course soon. When you're ready, go to the Course Assignments and Quiz web page to submit your coursework, evaluation, and certificate information. I'll see you in a workshop or another internet course! If you have any questions or comments, just drop me an email at [steve6342@attbi.com](mailto:steve6342@attbi.com).



***Have a great safe day!***

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