Introduction

Note: Safety culture is an important topic, but time consuming to inspect (because of the sample required) and difficult to tackle. It is recommended that it is only be taken on where there is good reason to believe that there is a significant issue to address, such as a poor safety record over a period, and where the company is likely to be receptive to advice.

An organisation’s culture can have as big an influence on safety outcomes as the safety management system. ‘Safety culture’ is a subset of the overall company culture (and is defined in the box on the right).

Many companies talk about ‘safety culture’ when referring to the inclination of their employees to comply with rules or act safely or unsafely. However we find that the culture and style of management is even more significant, for example a natural, unconscious bias for production over safety, or a tendency to focussing on the short-term and being highly reactive.

Symptoms of poor cultural factors can include:

- Widespread, routine procedural violations;
- Failure to comply with the company’s own SMS (although either of these can also be due to poor procedure design);
- Management decisions that appear consistently to put production or cost before safety.

In inspection, it is possible to gather evidence about a company’s culture, although this requires interviewing a suitably representative sample of people from all levels.

Key aspects of an effective culture:

Management commitment: this commitment produces higher levels of motivation and concern for health and safety throughout the organisation. It is indicated by the proportion of resources (time, money, people) and support allocated to health and safety management and by the status given to health and safety versus production, cost etc. The active involvement of senior management in the health and safety system is very important.

Visible management: Managers need to be seen to lead by example when it comes to health and safety. Good managers appear regularly on the ‘shop floor’, talk about health and safety and visibly demonstrate their commitment by their actions – such as stopping production to resolve issues. It is important that management is perceived as sincerely committed to safety. If not, employees will generally assume that they are expected to put commercial interests first, and safety initiatives or programmes will be undermined by cynicism.

Good communications between all levels of employee: in a positive culture questions about health and safety should be part of everyday work conversations. Management should listen actively to what they are being told by employees, and take what they hear seriously.
Active employee participation in safety is important, to build ownership of safety at all levels and exploit the unique knowledge that employees have of their own work. This can include active involvement in workshops, risk assessments, plant design etc. In companies with a good culture, you will find the story from employees and management being consistent, and safety is seen as a joint exercise.

**Inspection**

Inspection needs to involve interviewing a suitable cross-section of the company, particularly a reasonable number employees, who need to be interviewed in a non-threatening manner. The number needs to be sufficient to take account of differing views and experience. Given this condition the open questions given in the question set will provide a helpful picture of the overall style of the company.

NB unless the inspector has significant personal experience of trying to tackle safety culture, it would be best to simply reflect back what has been found, and give general rather than specific advice on how to improve it.

**Specific documents**

In addition to the general documents that should be requested prior to the visit (see chapter ‘Aim of the Guidance’) it is recommended that the following documents, which are specific to this topic, should also be requested:

- Results of climate/attitude/opinion surveys;
- Results of procedure surveys.

**Enforcement and advice**

Clearly, safety culture itself is not enforceable, and interventions are generally reserved for receptive companies, or as part of an overall incident investigation. However there can be enforcement to address outcomes of a poor culture. For example if a company is unsuccessfully relying on procedural controls to avoid major accidents, there could be enforcement of management arrangements to either ensure compliance or provide alternative safeguards through the hierarchy of control.

An Improvement Notice has been issued on implementing an SMS including identification and control of human reliability risks - the company subsequently managed to reduce accidents by over 50%. The recently published investigation report for BP Grangemouth was partly the result of an investigation into cultural factors underlying a series of major incidents. There have now been several other field interventions, generally seen as valuable by the company and site inspector.

**Guidance**

- **Successful health and safety management**, HSG 65
- **Reducing error and influencing behaviour**, HSG48
## Question set: Safety culture

<table>
<thead>
<tr>
<th>Question</th>
<th>Site response</th>
<th>Inspectors view</th>
<th>Improvements needed</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>1 Management commitment</strong>&lt;br&gt;• Where is safety perceived to be in management’s priorities (Senior/middle/1st line)?&lt;br&gt;• How do they show this?&lt;br&gt;• How often are they seen in the workplace?&lt;br&gt;• Do they talk about safety when in the workplace and is this visible to the workforce?&lt;br&gt;• Do they ‘walk the talk’?&lt;br&gt;• Do they deal quickly and effectively with safety issues raised?&lt;br&gt;• What balance do their actions show between safety and production?&lt;br&gt;• Are management trusted over safety?</td>
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<td><strong>2 Communication</strong>&lt;br&gt;• Is there effective two-way communication about safety?&lt;br&gt;• How often are safety issues discussed;&lt;br&gt;• With line manager/subordinate?&lt;br&gt;• With colleagues?&lt;br&gt;• What is communicated about the safety programme of the company?&lt;br&gt;• How open are people about safety?</td>
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<td><strong>3 Employee involvement</strong>&lt;br&gt;• How are people (all levels, especially operators) involved in safety?&lt;br&gt;• How often are individual employees asked for their input safety issues?&lt;br&gt;• How often do operators report unsafe conditions or near misses etc?&lt;br&gt;• Is there active, structured operator involvement e.g. workshops, projects, safety circles?&lt;br&gt;• Is there a continuous improvement / total quality approach?&lt;br&gt;• Whose responsibility is safety regarded to be?&lt;br&gt;• Is there genuine cooperation over safety – a joint effort between all in the company?</td>
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<td><strong>4 Training/information</strong>&lt;br&gt;• Do employees feel confident that they have all the training that they need&lt;br&gt;• How accurate are employees’ perceptions of hazards and risks?&lt;br&gt;• How effective is safety training in meeting needs (including managers)!&lt;br&gt;• How are needs identified?&lt;br&gt;• How easily available is safety information?</td>
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<td><strong>5 Motivation</strong>&lt;br&gt; - Do managers give feedback on safety performance (&amp; how)?&lt;br&gt; - Are they likely to notice unsafe acts?&lt;br&gt; - Do managers (all levels - S/M/1st) always confront unsafe acts?&lt;br&gt; - How do they deal with them?&lt;br&gt; - Do employees feel they can report unsafe acts?&lt;br&gt; - How is discipline applied to safety?&lt;br&gt; - What do people believe are the expectations of managers?&lt;br&gt; - Do people feel that this is a good place to work (why/why not)?&lt;br&gt; - Are they proud of their company?</td>
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<td><strong>6 Compliance with procedures</strong>&lt;br&gt; - What are written procedures used for?&lt;br&gt; - What decides whether a particular task will be captured in a written procedure?&lt;br&gt; - Are they read?&lt;br&gt; - Are they helpful?&lt;br&gt; - What other rules are there?&lt;br&gt; - Are there too many procedures and rules?&lt;br&gt; - How well are people trained in them?&lt;br&gt; - Are they audited effectively?&lt;br&gt; - Are they written by users?&lt;br&gt; - Are they linked to risks?</td>
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<td><strong>7 Learning Organisation</strong>&lt;br&gt; - Does the company really learn from accident history, incident reporting etc?&lt;br&gt; - Do employees feel confident in reporting incidents or unsafe conditions?&lt;br&gt; - Do they report them?&lt;br&gt; - Do reports get acted upon?&lt;br&gt; - Do they get feedback?</td>
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