Safety cultures:
Giving staff a clear role
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This report gives the results of research carried out by Public Concern at Work (PCAW) to investigate how organisations can develop the systems to assess and improve arrangements whereby employees can readily raise concerns about health and safety. The research programme, developed with the Health and Safety Executive (HSE), looked at the ways in which health and safety risks were identified and at the role and value of employees raising such concerns.

The research stemmed from a postal survey by PCAW among health and safety managers in a number of organisations from 15 major sectors. This survey identified the range of approaches being taken by organisations to whistleblowing and the potential barriers to employees raising health and safety concerns. The results of the survey were further tested against the views and experiences of other managers and employees through face to face interviews and through five focus groups.

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SAFETY CULTURES:
GIVING STAFF A CLEAR ROLE

CONTENTS

PART I:  INTRODUCTION

PART II: REPORT ON THE VIEWS OF HEALTH & SAFETY MANAGERS ON THE ROLE OF EMPLOYEE CONCERNS

PART III: REPORT ON FIVE FOCUS GROUPS

PART IV: REPORT ON EMPIRICAL RESEARCH
Safety Cultures: Giving Staff a Clear Role

PART I: INTRODUCTION
SAFETY CULTURES:

GIVING STAFF A CLEAR ROLE

PART I: INTRODUCTION

1.1 Summary
1.2 Background
1.3 Perceptions of Safety
1.4 Culture and Leadership
1.5 Views on the Role of Employee concerns
1.6 Managing Risk
1.7 Reporting Channels
1.8 The New Legislative Framework
1.9 Recommendations
SAFETY CULTURES: GIVING STAFF A CLEAR ROLE

INTRODUCTION

1.1 Summary

General

There has been a considerable increase in the overall awareness of health and safety issues over the last few years and the majority of those surveyed felt its importance received due emphasis at their place of work.

Many managers find considerable difficulty in keeping up to date with health and safety legislation, and find aspects of it unduly time consuming.

Large and medium sized organisations generally pay close attention to health and safety issues. Smaller companies, whilst acknowledging their importance, can give them less attention with the notable exception of small, family-run businesses.

Small companies used as sub-contractors were identified as a potential concern in that they often gave less attention to health and safety issues. This was in part due to perceived add on costs and the lack of positive incentives to adopt good health and safety practices.

Practical Issues and Their Relative Importance

The health and safety culture of an organisation is an integral part of its wider culture and must be viewed as such.

Successful companies are those where management at all levels feel a personal sense of ownership of health and safety. Ideally, an individual should be designated as having overall responsibility and he or she should be trained in the basics of health and safety management and its associated legal framework.

Senior managers are crucial in shaping a positive health and safety culture within an organisation. Everyone within the organisation looks to senior management to show clear leadership committed to health and safety.

Supervisors and managers are the critical grades for promoting health and safety, and they must be seen to have the backing of senior management.

Health and Safety Committees are generally becoming more like joint working parties and this is seen by all as making them more effective. Safety representatives are seen as being useful sources of information on health and safety issues and union representatives play an important role.

The size of an organisation is a significant factor in its approach to health and safety management. Larger organisations seem better placed to manage health and safety effectively. For small and medium sized companies, costs and lack of access to specialist knowledge could be significant barriers. However, total commitment and good practice was found across the entire range of organisational size.
1.2 Background

The first people to realise something may be going seriously wrong in an organisation are usually those who work there. Yet employees often do not voice such concerns or they voice them in the wrong way. Sometimes they think that because it is only a suspicion they should not bother anyone about it. Or they may think speaking up would be disloyal to their colleagues, their manager or their organisation. Often, they fear they will lose their job or be victimised. Where the concerns are about health and safety, the implications of not raising them can be disastrous. *(Clapham Rail Crash(1), Piper Alpha Explosion(2)).*

If organisations do not have a culture where a health and safety concern can be raised effectively with those who can properly address the problem, then either the issue may remain unknown to those in charge or the individual will feel compelled to voice the concern outside the organisation. The result can be that conscientious and loyal employees become aggrieved and disillusioned. At worst, management will be denied the opportunity to address a potentially serious problem before real damage is caused.

This is the report of a programme of research initiated by Public Concern at Work to investigate how organisations develop the systems and conditions that permit the successful identification of and response to hazards and dangers in the workplace.

This report will help organisations to assess and improve arrangements whereby employees can readily raise concerns about health and safety. The research programme, developed with the HSE, looked at the ways in which health and safety risks were identified and at the role and value of employees raising such concerns.

There were three main components to the work:

- A postal survey of safety managers;
- Face to face interviews with safety managers and colleagues;
- Five “focus groups”.

Postal Survey

This research was conducted in 1997 after a postal survey by Public Concern at Work among Health and Safety Managers in a number of organisations from fifteen major sectors. It identified the range of approaches being taken by organisations to whistleblowing and the potential barriers to employees raising health and safety concerns. The results of this research are reproduced in Part II.

Further work was then commissioned to test the results against the views and experiences of other managers and employees, and to provide further insight into how reporting works in practice across a diverse range of organisations.

Five “Focus Groups”

At the end of 1997 the market research firm Right Angles recruited individual managers and staff for five “focus groups” which comprised the third part of the work. Each group had 8 or 9 members who freely discussed these issues, without having to identify their organisation.

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(1) Department of Transport, Investigation into Clapham Junction Rail Accident: (HMSO, 1989).
(2) Department of Energy, Public Inquiry into the Piper Alpha disaster (HMSO, 1990).
Reporting Concerns

Employees tend to report concerns via the route that they perceive as being most effective. This varies with the organisation and staff may bypass the formal reporting route where they can go directly to someone who can resolve the issue.

There is a far greater willingness to report concerns over equipment, procedures etc. than over the behaviour of an individual. This is particularly striking among lower level blue-collar staff who do not want to alienate themselves from their peer group.

In organisations with poorer safety cultures, the union and safety rep. are seen as being highly effective routes for raising health and safety concerns. Personnel are not.

Reporting concerns outside the organisation is seen as a last resort.

Whistleblowing Procedures

The effectiveness of reporting health and safety concerns seems to be closely linked with the general culture of an organisation; the better the culture, the greater the leadership, the more likely issues will be raised and dealt with by an organisation. Factors that help to promote effective reporting are:

- An open culture;
- Prompt response to and feedback on the concern; and
- Safe and accepted alternatives to line management

All participating organisations had formal reporting systems for accidents, nearly always involving completion of a form. However, in those organisations with poor safety cultures these are likely to be seen primarily as a means to pursue or defend claims for compensation. As such, conflicts between insurance and safety management needs can be a problem, with the result that there is less likelihood of concerns being reported in these organisations.

Organisations with well-developed safety cultures use many additional ways of identifying and reporting potential health and safety concerns. Notable amongst these are:

- Near miss/minor event reporting;
- Team approaches to identifying and fixing hazards; and
- Whistleblowing (or confidential reporting) schemes.
The respective groups were blue-collar employees, white collar employees, managers in both sectors and finally, senior management. The report is reproduced in Part III.

**Twenty Site Visits**

In early 1998 Greenstreet Berman Ltd, a management consultancy on health and safety issues, carried out on-site interviews with health and safety managers and employees in twenty companies which had consented to help with this research. The companies ranged in size from multinationals to small, single site businesses. In each participating company, the research started with an on-site interview with the corporate Health & Safety Advisor or the site Health & Safety Manager. Where appropriate and practicable, further on-site interviews were carried out among the workforce and managerial colleagues to get a broader range of perspectives. The report is reproduced in Part IV.

In the following sections we summarise the key findings of these three projects before considering the new legislative framework for employee concerns. We then make a number of general recommendations.

### 1.3 Perceptions of Safety

The three research projects found, not surprisingly, that individual perceptions about, and attitudes to, health and safety issues are closely related to the nature and “safety culture” of the organisation that they work for.

#### 1.3.1 The Importance of Safety

The vast majority of interviewees and focus group attendees recognised the importance of safety and of the need to manage it actively. This was the case with office staff as well as those involved with manual occupations.

While in some cases management is perceived by the workforce to be motivated by insurance pressures or fear of prosecution, in the majority of organisations good health and safety is seen to be enlightened self-interest.

There is a general consensus that considerably more emphasis is placed on health and safety now than was the case even a few years ago. This is attributed to a wide range of factors, including pressure from regulators and insurers, commercial pressure, higher employee expectations and the cumulative effect of EU directives.

The increased emphasis on health and safety was broadly welcomed at all levels. However a number of middle and senior managers expressed frustration at the amount of extra work some requirements generated.

White collar staff in particular felt their companies ensured that they worked in an environment that was physically safe but that the less tangible effects on their long term health were not so well regarded.

Where the need to ensure customer safety was mentioned, research participants often added that members of the public were all too willing to breach safety regulations and sometimes put pressure on staff to do so.
Violence was raised as a workplace problem in the health and education sectors, where it seemed to be a genuine concern as all the interviewees knew of someone who had been assaulted by a member of the public.

1.3.2 Risk Awareness

Risk awareness underpins health and safety management. Without an aware management team and workforce risks will go unrecognised, unreported and untreated. Risk awareness has a wide application – the same hazard can threaten production, worker or public safety, the environment and corporate reputation, depending on how it is manifested on the day.

Health & Safety Managers saw developing programmes to improve risk awareness and its promotion as a key aspect of their jobs, and a variety of potential initiatives were mentioned, such as holding a ‘fire week’ or ‘slips and trips week’. Roadshows, exhibitions, special issues of newsletters, tool box talks and video presentations were also mentioned among larger organisations where active participation was seen as a vital part of staff awareness.

It was clear from focus groups, interviews and the postal survey that the successful companies were those where management at all levels genuinely felt a personal sense of ownership of health and safety, and continually looked for ways to improve it. So while Health and Safety Managers have an advisory, supporting and monitoring role, there is no question of their taking on the day to day responsibility for safety that properly lies with line management. However, the research recognised that responsibility travels up the line, and in senior management potential legal liability often helps ensure that health and safety issues are properly addressed.

1.3.3 Effect of Organisational Size

The size of the organisation inevitably constrains the approach taken to health & safety management. The interviews and focus groups covered very small companies as well as very large ones. Examples of total commitment and good practice were found at both ends of the spectrum, as were examples of poor practice. In smaller organisations, it depended above all on senior management.

Employees of larger, well-known organisations and some of those in the public sector seemed more likely to feel that they worked in a well managed environment and that their exposure to risk was relatively small. The reasons for this included:

- They are more likely to have modern, purpose built premises;
- They have the resources to maintain a dedicated health and safety group, maintenance teams and staff training;
- They make better use and availability of protective clothing and equipment;
- A strong union presence is more likely;
- Risks and safety management are more likely to be controlled by procedures and standards;
- They are usually more able to finance repairs and improvements;
- Investments in awareness, risk assessments and standards can be shared between associated companies or sites;
- There could be more pressure from regulators, insurers and shareholders to maintain high standards.
However, where organisations relied on hierarchical structures and compartmentalisation, it was recognised that there was an increased risk of local safety culture breakdown, and little chance of successfully introducing empowerment and team working. Where public sector organisations have large overall budgets, it was suggested that they sometimes seem to be particularly short of resources for remedial measures.

In the private sector, it was reported that small-to-medium sized sites that, due to hazards inherent in the business require a proper safety management system, may not have the resources to operate effectively especially in sectors where margins are low.

It was also recognised that smaller companies may not have the need or resources to employ specialist consultants as communication is often easier in a small team. The research found examples where management were felt to be genuinely concerned for their workforce in some small, sometimes family-run, businesses. More generally though, smaller companies seemed to place much less emphasis on both training and the implementation of health and safety regulations. This was not just the view of the employees. Managers and supervisors in smaller companies themselves recognised they were all hard pressed and found it difficult to keep up to date and to manage safety proactively.

One issue of concern was that those small companies that regularly act as sub-contractors paid less heed to health and safety regulations and to health and safety concerns, both in terms of worker safety and disposal of hazardous waste.

Managers of companies working with sub-contractors said they did not wish to cause aggravation by over-zealously acting out their health and safety responsibilities, and that considerable diplomatic skills were required to promote health and safety in an environment where other companies are affected. In such situations the need to cover one's legal liability appears to be a major influence on their decision to act on a concern.

“If you report everyone you get a reputation and you’re looking at your next job...you’ve got to be careful how you speak to certain people if you want to work with them again.”

(Middle level blue collar)

1.4 Culture, Leadership & Organisation

1.4.1 Culture

A good safety culture is one where the mental attitude of both workers and management is such that when a risk to health and safety is perceived, it will be reported promptly to the designated people. They, in turn, will investigate it and remove or reduce any unwarranted risk. There seemed to be a common understanding that corporate culture or ‘the way we do things around here’ was the major determinant of a good safety culture and interviewees noted that safety culture often reflected a wider approach to quality and corporate responsibility.

In analysing the types of culture they found, the Greenstreet Berman researchers settled on three categories: ‘compliance driven’, ‘managed safety’ and ‘constructive intolerance’.
Compliance Driven

In these organisations, regulatory frameworks are translated into internal procedures and compliance is assured largely by close supervision. The aim is primarily to stay out of trouble with the regulator and senior management. Getting concerns addressed is often a matter of personal persistence.

Managed Safety

These organisations have moved one step further and put formal safety management systems in place. These systems generally include mechanisms for policy definition, allocating responsibilities, implementing systems and measuring performance in some way. The organisation can thus move beyond external prescription and set its own targets and standards.

Constructive Intolerance

A few organisations had introduced a culture that devolves responsibility to the team level and here there tended to be more emphasis on local ownership of health and safety issues, and on developing risk awareness. The aim is to encourage ‘constructive intolerance’ of unsafe or potentially unsafe conditions, coupled with a commitment to taking responsibility for either dealing with the hazard or ensuring that it is dealt with. This ties in well with the requirement for continuous improvement that many organisations have now adopted in all aspects of their operations. It was best summed up by one interviewee as “Don’t accept unsafe conditions and don’t take no for an answer!”

All the larger organisations were looking at the potential for further improvements in safety through ‘behavioural modification’ programmes. However, there did seem to be a feeling amongst employees that such programmes targeted the workforce, when in fact there was an equal need to address behaviour at management level.

The view was expressed by some interviewees that changing culture was made easier if there was an opportunity to make a break with the past, such as a move to a new building. But even then it was recognised that improvement needs to be sustainable and continuous as opposed to ‘quick fix’ initiatives.

While older or established workforces are sometimes said to be more resistant to change, Greenstreet Berman (who interviewed people of all age groups) found no correlation between age and attitude, though of course it was far from a random sample.

1.4.2 Leadership

The health and safety culture does not develop independently of the wider culture. While there has been a move to devolve responsibility, it seems clear that a good health and safety culture requires genuine commitment and active, visible leadership from senior management.

An open safety culture that encourages concerns to be raised does not do away with the need for supervision, even if the approach to supervision changes. The roles of supervisors and foremen will, in fact, be central to effective oversight of the policy and the importance of good, conscientious and safety-aware supervisors and team leaders was mentioned in many interviews.

Supervisors and managers are the critical grades of staff when it comes to promoting health
and safety, encouraging reporting, investigating events and implementing remedial measures. Those interviewed needed to feel that they would have the backing of senior management if they, for example, had to stop production due to a safety risk.

Senior management is crucial in shaping the culture. Clear, committed leadership is what everyone seems to be looking for. People want to be empowered, but they want to be given a vision and a sense of direction. In a small company, ‘the boss’ defines the culture for good or ill in a much more direct way, and hence has a greater personal responsibility and must set a very clear example. Those interviewed judged the organisation’s commitment by senior management’s active involvement in safety, as well as the level of resources and time allocated to it. Employees frequently spoke of the importance of seeing their senior management in the workplace taking a personal interest in safety.

1.4.3 Organisation

Health & Safety Professionals
Several medium-sized sites visited had a full time Health & Safety professional, and some multi-site companies and groups had a corporate Health & Safety advisor reporting at the highest level. In terms of creating the culture and demonstrating the commitment, the presence of such a professional played an important role.

Health & Safety Committees
All the organisations surveyed had site Health & Safety Committees, though Health & Safety Committee business may be covered within broader consultative arrangements. Almost all participants reported a gradual transition from the old fashioned confrontational stereotype towards a much broader joint working party model. The transition from ‘talking shop’ to proactive Health & Safety Committee was fairly recent in most cases, and interviewees linked it to changes in both management and union attitudes.

One of the main benefits of an active Health & Safety Committee seemed to be the opportunity it gives to involve people in health and safety issues and develop their awareness. Additionally it helps develop a critical mass of people committed to Health & Safety culture on site.

The Health & Safety Committee representatives provide a valuable diverse channel for reporting events and hazards. In organisations where there are still elements of ‘old culture’ management, they were more likely to be the most frequently used channel and were determined in championing their colleagues’ concerns. Union backing, even if it is just the knowledge that additional support is available if required, is invaluable to them. Where they were accessible and informed, Health & Safety Committee representatives were clearly a useful source of advice for people who were unsure whether to report a concern, how to do it, and what supporting information would be required.

Promotion of Health & Safety
Many different methods of health and safety promotion were related by interviewees: from a battered leaflet on a notice board, to rigorous training courses at the other end of the scale. Generally, health and safety awareness and good practice is promoted by a variety of methods including:

- General induction course and / or a manual to read and sign;
- Job specific training;
Occasional fire drill;
Posters;
Leaflets on notice boards;
Correction exercise in advance of HSE visit;
Occasional memos (white collar); and
Staff meetings (white collar).

Training
While training is not a substitute for broad experience, it was recognised that it can be vital to
good safety management in large organisations where, for example, site induction has to
re-orient contractors to the client’s expectations and safety management systems. The better
organisations looked to develop their Health & Safety Committee members and safety
supervisors through additional training and involvement.

On sites where the number of hazards was high, emergency exercises were accepted as a
routine part of the risk management programme. The exercises were seen to provide an
opportunity for unrecognised concerns to be identified, providing they were run in a way that
encouraged and stimulated those involved to speak out about difficulties they had
encountered in similar situations.

Some of those working in small organisations claimed to receive little formal health and
safety training. Here, relevant issues were communicated informally as part of the on-the-job
training and were seen to be basic common sense. The risks of this approach were identified
by one member of the focus groups:

“The regulations apply to everyone but the eyes aren’t on the small jobs. Small companies
don’t know. You don’t get taught. I know some people with so called Health and Safety
responsibilities who have never been on a course in their life...It’s all right for the big
companies where things are done by the book. But for small operations it’s all down to
cost. They cut corners all over the place. No one pays much heed to health and safety
regulations in our environment unless it’s basic common sense...I can tell them to do
something but when my back is turned they’re back doing it the old way.”

(Middle level, blue collar)

However, irrespective of organisational size, many of the managers taking part both in the
focus group and on-site interviews claimed to have difficulty keeping abreast of the volume
and flow of health and safety directives, regulations and initiatives.

1.5 The Role of Employee Concerns

All the research has shown that the reporting of health and safety issues is both fundamental
to, and a clear indication of, the “safety culture” of an organisation. In organisations with
good safety cultures reporting will be open, and via a variety of effective routes (both formal
and informal).
1.5.1 Perceptions of Individuals

The views of employees
Among both white and blue collar staff there is a noticeable difference in how people said they would treat a concern about a procedure or piece of equipment, and what they would do if they were concerned about the behaviour of an individual.

The survey showed that in many organisations, particularly those with an open culture, there was a genuine commitment to make whistleblowing safe and accepted, so that most employees would readily report a potential hazard.

However, a minority of employees, usually those working in environments where health and safety monitoring was considered relatively slack, were more cautious. Not wanting to be seen as whingers or troublemakers, they would seek the support of colleagues before ‘making a complaint’. If no support were given, then individuals would rather not ‘stick their neck out’ and would either live with the risk or leave the organisation:

"A lot of the time you just keep it to yourself and just make sure it’s not going to affect you."

(Lower level, Blue Collar)

As said, if the behaviour of a person is the concern, the situation is generally more difficult. In the focus groups, shop floor staff in particular voiced a fear about alienating themselves from their peer group by being seen as "a squealer" or someone who "grasses" to management. Where the worker causing the concern has long service, questioning his behaviour would be particularly problematic.

Whatever the culture, it was felt that raising a concern about a colleague would have to be handled with care and if the bad practice was not considered to be positively dangerous, many admitted they might choose to ignore it rather than risk upsetting the status quo.

Where there was an adversarial culture, there was a greater readiness to report a supervisor who was at fault. Generally, however, employees felt that they would be more likely to change their employer than to challenge their seniors over a health and safety issue. The view was expressed that by going outside line management they would stir up trouble for themselves, unless there were safe and accepted whistleblowing channels.

The views of management
The majority of managers and supervisory staff said they encourage staff to report their concerns and consult them before introducing any changes. This was particularly the case with small-to-medium sized manufacturing companies where management and staff enjoyed a co-operative, constructive relationship and this remains the case when resources and time are limited.

Organisations that did not have this culture feared that the introduction of whistleblowing channels would lead to them being inundated with trivial issues.
Where channels existed, a good number of middle managers expected their workforce to report concerns initially to them and expressed the view that they would not be happy if they were 'by-passed':

"I would see it as trying to get me into trouble."

(Middle level, White Collar)

An important exception to this were managers from the blue collar sector, who felt that a good union representative can lighten a manager's load by filtering out time-wasting complaints and, in some instances, by by-passing the immediate line management system and going direct to the decision makers.

1.6 Managing Risk

Good safety cultures rely not only on a reactive system such as event reporting, whereby hazards are brought to the attention of staff or management in the course of their normal tasks, but also on proactive measures such as surveys, maintenance schedule inspections, risk assessment and auditing. These can also provide welcome opportunities for concerns to be raised by the workforce.

1.6.1 Risk Assessment

Risk awareness was seen as underpinning all good management and the objective was to implement a structured programme that would produce an enduring impact by involving as many people as possible. As risk assessment is a regulatory requirement, it is a major activity on sites and it is also one of the main routes by which hazards are identified.

Although generic risk assessments were sometimes provided by corporate or site health and safety personnel, all the participants seemed to agree that the risk assessments should involve the team or individual whose work area was covered. Responsibility for ensuring that they were done, however, clearly rested with line management.

Properly run, risk assessments allow employees a good opportunity to raise concerns and discuss their experience, including accidents and near misses, in a non-judgmental context.

1.6.2 Auditing

Audits were seen as a way of identifying hazards directly and were seen as complementary to, rather than an alternative to, hazard and event reporting. In better-developed cultures, audits were usually more about 'reality checks' than 'policing'. This led to considerable spin-off benefits, including awareness raising and the stimulation of informal hazard and event reports.

Audit programmes varied in their timing, but the view was that they needed to be reasonably frequent to keep awareness and standards high. Often they were linked to risk assessments. Auditing usually, but not always, extended to contractors. Whatever the nature of the audit or walkabout, those involved generally stressed the importance of talking to people and asking why things were the way they were. It was said that compliance audits by remote figures did not achieve the same range of benefits. Audits that resulted in large numbers of trivial findings and remedial actions also quickly fell into disrepute.
1.7 Reporting Channels

Reporting channels varied as to the matters they covered. While all embraced accidents involving injury or loss, some also covered unsafe acts and near misses, inherent inadequacies and design defects. The means to maintain awareness of these procedures included: notice boards, posters, videos, induction courses, safety training and supervisors.

1.7.1 Accidents

All the participating organisations had a formal reporting system for accidents and incidents. At its simplest, this might be an accident book that is regularly reviewed by management, unions and the Health & Safety Committee. More usually, there was a scheme that relied on a form being completed and distributed to interested parties. It was clear that Accident & Incident report forms needed to be extremely easy to use and widely available.

In a few organisations, however, such reports seemed to be considered important primarily as a means to pursue or counter compensation claims, and this had a major impact on the culture.

In larger organisations, depending on the severity of the accident, the initial investigation was conducted by the supervisor or departmental manager, supported by the Health & Safety team. Even then, local ownership of the problem and its solution was recognised as important. Most organisations provided training in investigation techniques for those who may be involved.

1.7.2 Near Miss Reporting

Near miss reporting is also a valuable tool. As safety management improves, so the importance of near misses as a source of data also increases and where such schemes are an integral part of safety management, the evidence showed that it helped ensure a low accident rate.

Most of the organisations surveyed had a form that could be used for near miss reporting, but the systems were generally much less well developed than those for accident reporting and less well known. There seemed to be considerable scope for improvement.

Where they did exist, a rapid response was important, even if it just acknowledged the report and said that it was included in the data for analysis. It was recognised that remedial action was also needed in a percentage of cases, but the numbers of reports involved meant that a screening stage often had to be included.

In several of the participating organisations, the preferred route seemed to be for teams to take the responsibility for identifying and fixing hazards in their own workplace, and for responding to near misses and events within their area of responsibility whenever practicable. This approach develops ownership and is often very effective, but it depends on the team having a strong internal safety culture and expertise in screening. In the best safety cultures, this approach was supported by audit.
1.7.3 No-Blame Cultures

Many participants mentioned the need for a no-blame culture as a prerequisite for an open culture generally, and for effective reporting of hazards and events in particular. However when they were pressed, it seemed that ‘no blame’ did not mean undermining responsibility. People generally did not want to see those whose actions put others’ lives in danger escaping the consequences.

1.7.4 Confidentiality and Anonymity

The issue of whistleblowers identifying themselves was seen as an independent issue. The option of anonymity existed within many reporting schemes: the person filling in the report merely left his or her name off or wrote a letter, rather than using the official form. Any good scheme took note of anonymous reports, even though anonymous reporting was rarely encouraged. This was because anonymous reports have less credibility, they usually omit vital information, there is no chance to get further information and feedback is impossible.

The option of offering staff confidentiality was seen as reducing the need for anonymity and giving people an alternative. Confidentiality usually means that the name of the reporter is known to the co-ordinator of the reporting system but not to management or colleagues. It requires more trust in the arrangements and, since people may feel they are taking a risk when reporting, it was recognised that high profile management commitment was required.

1.7.5 Responding to Concerns

The futility of reporting concerns if nothing was going to happen was seen as a strong demotivating factor. Accordingly, prompt attention to hazard reports is vital:

"Issues will only be raised if people see that things get fixed as a result - soon enough for them to associate the two."

(Quality Manager)

On many industrial sites, repairs were the responsibility of the maintenance and general service departments, and there the speed and effectiveness of their response was a real issue. Accordingly, some monitoring is desirable.

Almost all organisations using a form acknowledged receipt of a report by means of a tear off slip or something similar. Feedback is vital, to maintain enthusiasm for a scheme, to disseminate the lessons learned, to stimulate other reports, and as a quality check. However, where the output from reporting schemes tended to be high-level statistical analyses aimed solely at management, employees would quickly lose faith in the procedure.

1.7.6 Bonus and Suggestion Schemes

"Reward schemes for health and safety? Yes we have one. It’s called ‘either get it right or leave the site’. Keeping your job is an incentive, isn’t it?"

(Health & Safety Manager)
Opinions differ as to whether bonuses should be linked to Health & Safety performance. While there were examples of apparently successful applications, most interviewees seemed doubtful. On the one hand, the use of bonuses in this area can emphasise personal responsibility, ensure audits and remedial works are carried out and integrate Health and Safety in personal development and appraisal systems.

However, problems could arise because it is difficult to find indicators of Health & Safety performance that are not linked to event rates, and bonus schemes could simply reduce the level of reporting without doing much for risk reduction. Some sites seem to maintain reporting with such schemes in place, but the culture has to be very open for it to work.

From the on-site interviews with safety managers, interviewees mentioned many instances where improvements were made at the suggestion of employees. However they were all made in the context of quality teams of Health and Safety Committees. Formal suggestion schemes were becoming less common as management tried to foster the idea that continuous improvement is part of the job.

1.7.7 The Need for Diverse Reporting Routes

Breakdowns in risk management led not only to accidents but tended to lead to failure to take corrective action and increase the risk that the true situation would be concealed. To be robust in the face of a local breakdown in management control, reporting routes must be diverse, with an alternative independent of line management. Many organisations knew there must be a route capable of reaching beyond any local breakdown and that people reporting events must have confidence in those on the receiving end. Diversity is essential for this reason.

In most organisations, the first step in raising a concern or reporting an event or near miss is to go to the supervisor. The supervisor, therefore, has a very considerable influence on reporting. If there are personality difficulties, or if reports are not taken seriously, reporting will soon drop off unless there is a safe and accepted alternative channel.

It is common for procedures to specify what the employee should do if he or she gets no satisfaction from the supervisor when raising a concern. Typically, the preferred approach is to work up through the management chain, though this is not an alternative route as such and could prove exhausting and ineffective.

Early warning of poor practices or breakdowns in safety culture came from analysis of events or near misses, or it came directly from 'whistle blowing' reports. While the latter can be more difficult to integrate formally into the Health & Safety management system, they provide an alternative to external disclosures. In all the larger organisations surveyed, there was an in-house 'hot line' option for raising such concerns.

Hot lines are not just an 'emergency route'. The phone-in option seems ideally suited, for instance, to organisations where there is a large number of field staff and team level resolution is impractical. Interviewees also commented they were important as they involved no bureaucracy and no delays.
1.7.8 The Role of Health & Safety Committees and Union Representatives

Participating organisations recognised that many routine hazard and near miss reports would be through less formal channels: union representatives, Health & Safety Committee members and members of the Health & Safety Group were commonly used because of their accessibility.

As well as simply being a convenient route into the Health & Safety Committee, union representatives can take up cases which people are unwilling to trust to the normal system, and so offer an important alternative for raising concerns or reporting events at a higher level:

"Officially I am supposed to go to my supervisor and he then takes it up the line. But I usually go straight to the union and it works a lot quicker."

(Lower level, Blue Collar)

In non-unionised companies, approaching personnel rather than a line manager is an option. However, both lower level staff and middle managers in other roles were sceptical in their comments about the effectiveness of personnel in this respect.

1.7.9 Diverse Reporting in Smaller Companies

Smaller companies inevitably had more difficulty in arranging for diverse reporting options, but the research showed it is possible for even the smallest to find someone willing to be contacted, if necessary confidentially, e.g. a non-executive director or professional advisor.

"There is a notice on the board, telling everyone what the Directors’ and the Authority’s phone numbers are. [The procedure is] ring them if you don’t get satisfaction."

(Supervisor)

Importantly, the smallest organisations represented tended to operate an ad-hoc open door policy, so employees would feel able to speak directly to the managing director or partner concerned.

1.7.10 Reporting and the Regulator

"Health and safety is not completely black and white but nearly. It’s very clear if you have broken the law. I wouldn’t have a concern about outside agencies being involved, although I might be irritated by it. But I could understand it."

(Senior manager)

Some interviewees mentioned relationships with the Health & Safety Executive and their regional equivalents. One or two reported problems in getting a sufficiently enlightened response to reports and issues raised by the organisation itself. It seemed that regulators would assume that increases in the number of events and near misses when new initiatives were implemented were a cause for concern, when it was said they simply reflected better safety management and more complete reporting rather than any real increase.
Audits by HSE staff were said to have a huge impact. At least three of the sites visited had attracted detailed HSE attention for one reason or another, and in two cases it provided the impetus for a major overhaul of the health and safety management system. One or two safety personnel said they would have welcomed the support that an HSE inspector might have been able to give them.

As to employees contacting the HSE or other appropriate regulators, this occurred mostly where the problem was very serious and when every appropriate route within the organisation had been exhausted. However, many employees felt that even then, concern for their job security and the fear of being seen as a trouble maker would prevent them having the confidence to follow an issue through in this way. White-collar staff in the focus groups felt it might well be easier to leave the organisation and work elsewhere:

"You'd only go to the HSE as a last resort... you'd be worried whether you were going to keep your job or not."

(Middle level, White Collar)

This attitude is likely to change somewhat when the Public Interest Disclosure Act comes into force (see section 8).

1.7.11 Reporting to the Media

Reporting to the media is seen only as a very last resort. There was a view, however, that the fear of media coverage might be highly effective in forcing a reluctant management to address the problem.

1.8 The New Legislative Framework

The Public Interest Disclosure Act is due to come into force in England, Scotland and Wales early in 1999 and in Northern Ireland during 1999. The Act aims to improve accountability in organisations in the public, private and voluntary sectors. It does this by encouraging people not to turn a blind eye to malpractice in the workplace. Through its sanctions, it will help ensure that organisations

- address the message rather than the messenger; and
- resist the temptation to cover up serious malpractice.

The Act does this by protecting employees who blow the whistle in the following circumstances from victimisation. While this is the first major piece of whistleblower protection law in the UK, it leaves intact the existing health and safety provisions in the Employment Rights Act.

Malpractice
The Act applies to people at work raising genuine concerns about dangers to health and safety (and also about crimes, breaches of legal obligation, miscarriages of justice and dangers to the environment) and to the cover up of any of these. It applies whether or not the information is confidential and whether the malpractice is occurring in the UK or overseas.

Individuals covered
In addition to employees, it covers workers, contractors, trainees, agency staff, homeworkers, and all professional in the NHS. It does not cover the genuinely self-employed (other than in the NHS), volunteers, the intelligence services, the army or police officers.
Internal disclosures
A disclosure to the employer (which may include a manager or director) will be protected if the whistleblower has an honest and reasonable suspicion that the malpractice has occurred, is occurring or is likely to occur. Where a third party is responsible for the malpractice, this same test applies to disclosures made to him. It also applies where someone in a public body subject to ministerial appointment (e.g. the NHS and many ‘quangos’) blows the whistle to the sponsoring Department.

Regulatory disclosures
The Act makes special provision for disclosures to prescribed persons. These will be regulators such as the Health and Safety Executive (and for other matters, the Inland Revenue and the Financial Services Authority). Such disclosures will be protected where the whistleblower meets the tests for internal disclosures and, additionally, honestly and reasonably believes that the information and any allegation in it are substantially true.

Wider disclosures
Wider disclosures (e.g. to the police, the media, MPs, and non-prescribed regulators) are protected if, in addition to the tests for regulatory disclosures, they are reasonable in all the circumstances and they are not made for personal gain.

The whistleblower must, however, meet a precondition to win protection for a wider disclosure. These are that (a) he reasonably believed he would be victimised if he had raised the matter internally or with a prescribed regulator; or (b) there was no prescribed regulator, and he reasonably believed the evidence was likely to be concealed or destroyed; or (c) the concern had already been raised with the employer or a prescribed regulator. These preconditions do not, however, apply where the malpractice is of an exceptionally serious nature.

If these provisions are met and the tribunal is satisfied that the disclosure was reasonable, the whistleblower will be protected. In deciding the reasonableness of the disclosure, the tribunal will consider all the circumstances, including the identity of the person to whom it was made, the seriousness of the concern, whether the risk or danger remains, and whether the disclosure breached a duty of confidence which the employer owed a third party. Where the concern had been raised with the employer or a prescribed regulator, the tribunal will also consider the reasonableness of their response. Finally, if the concern had been raised with the employer, the tribunal will consider whether any whistleblowing procedure in the organisation was or should have been used.

Full protection
Where a whistleblower is victimised in breach of the Act he can bring a claim to an employment tribunal for compensation. Where the victimisation falls short of dismissal, the Act provides that awards will be uncapped and based on losses. Dismissals in breach of the Act are automatically unfair. Where the whistleblower is an employee and he is sacked, he may within seven days seek interim relief so that his employment continues or is deemed to continue until the full hearing.

As to compensation for unfair dismissal or termination of a worker’s contract, the position at the time of writing is not certain. The Government has said it will introduce regulations under the Act which will provide that whistleblowers get more than normal unfair dismissal awards. All sides of business and all interested parties believe that whistleblowers should receive uncapped compensation based on loss, and this seems the most likely arrangement. The Government is consulting on whether – in addition to compensation for losses – whistleblowers should be entitled to claim aggravated damages or should receive special awards.
Confidentiality clauses
Gagging clauses in employment contracts and severance agreements are void insofar as they conflict with the Act's protection.

Whistleblowing procedures
Though the Act does not require organisations to set up whistleblowing procedures, the existence of the Act will encourage the adoption of such procedures. Key aspects of such procedures, as endorsed by the Committee on Standards in Public Life (supra), are

- a clear statement that malpractice is taken seriously in the organisation;
- an indication of the sorts of matters regarded as malpractice;
- respect for the confidentiality of staff raising concerns, if they wish it;
- the opportunity to raise concerns outside the line management structure;
- penalties for making false allegations maliciously;
- an indication of the proper way in which concerns may be raised outside the organisation if necessary;
- allowing access to some other external body such as an independent charity; and
- giving staff of key sub-contractors and suppliers access to your whistleblowing policy.

1.9 Recommendations

Health and Safety Culture is an integral part of the overall culture of an organisation — Quality of products or services, staff motivation and customer retention are unlikely to improve if health and safety is ignored.

Good Communication and an Open Co-operative Culture — Organisations should aim to establish a culture which encourages all employees, at whatever level, to feel a sense of responsibility for each other's health and safety, and to raise any concerns they may have.

Beyond compliance — The best safety cultures stem from organisations that adopt an attitude of "constructive intolerance" of unsafe and potentially unsafe conditions. This can help ensure a continual improvement in health and safety performance. Organisations of all sizes should seek to create an atmosphere where staff and management freely accept that such safety concerns need to be raised.

Size is no excuse — Although larger organisations seem to be better placed to manage health and safety, smaller companies should recognise that they can and do perform extremely well.

Commitment and direction from the top — Senior managers should understand, accept and clearly demonstrate their responsibility for setting the overall culture of health and safety in an organisation irrespective of its size. All other efforts are likely to be secondary to the effect created by people at the top.

Key role of supervisors and managers — Senior management should be seen to encourage and support supervisors and managers in promoting health and safety.

Health and Safety is a line-management responsibility — Line managers should be encouraged to take "ownership" of health and safety in a pro-active fashion, and to accept that it is better that a safety concern is raised through another channel than not at all, where the employee feels uncomfortable about raising it with his/her line manager.
Health and Safety Committees and Safety Representatives – These should be positively encouraged to develop a collaborative working relationship.

Breaking the Information Monopoly – Organisations should go beyond one formal reporting route in order to ensure effective reporting of potential health and safety concerns. Whistleblowing policies should be introduced to supplement line management. Even where those promote safety representatives and committees, someone senior should be demonstrably in charge of the policy. The recipient should be obliged to respond within a specified period.

Delivering the Policy - Employees should all be made aware of the routes they can take when wishing to report a concern. Staff should also be encouraged to report their concerns to a specific person or position (this should usually be line management in the first instance) and in addition, an alternative route should be available for those who for any reason have not met with success by 'going up their line'.

Feedback - Communication must be two way, with employees being kept informed as to the 'progress' of their concern. If managers do not give feedback, employees will assume they have ignored the issue.

Peer Pressure - Efforts need to be taken to address the effects of peer pressure. While it often seems to be acceptable to report the failing of a manager, it is widely frowned upon to report the failing of a colleague. While this matter warrants further research, managers should consider this as a topic for staff to discuss when training or introducing a whistleblowing scheme.

Subcontractors - Organisations that subcontract a lot of work should consider how far they can and should require and monitor high safety standards from the subcontractors.

Public Interest Disclosure Act
In the light of the new legislation, employers should ensure that:

- They have a well publicised reporting scheme in place;
- Managers and staff are aware that victimisation of workers for using the scheme will not be tolerated;
- Concerns raised under the scheme will be treated promptly, and in confidence if the worker so wishes;
- Feedback is given where such a concern is raised; and
- Staff are not discouraged from reporting concerns to a regulator such as the HSE.

Further information about the legislation and how it affects employers and employees is available from Public Concern at Work at suite 306, 16 Baldwins Gardens, London EC1N 7RJ. Telephone 0171 404 6609. Website: www.pcau.demon.co.uk

1st December 1998
Safety Cultures:
Giving Staff a Clear Role

PART II:
REPORT ON THE VIEWS OF HEALTH AND SAFETY MANAGERS ON
THE ROLE OF EMPLOYEE CONCERNS

Qualitative research into Health and Safety Cultures

A Report By Greenstreet Berman Ltd
For Public Concern At Work
And The Health and Safety Executive

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# Qualitative Research into Health & Safety Cultures

## Contents

### Introduction
1. Background  
2. Report Format  
3. Acknowledgements & Caveats  

### Key Findings
1. Importance of Health & Safety  
2. SHE Culture  
3. Leadership  
4. Communication  
5. Ownership of Safety  
6. Health & Safety Professionals  
7. Health & Safety Committee  
8. Involving the Workforce  
9. Reporting of Hazards and Events  
10. Risk Assessment and Audit  
11. Responding to Concerns  
12. Training  
13. Organisation Size  
14. Role of the Unions  
15. Workplace Violence  

### Scope and Methodology
1. Introduction to Programme  
2. Interviews  

### Culture
1. Corporate Culture  
2. The Importance of Good Management Commitment  
3. Allocation of Resources  
4. Implementing Culture Change  

### Organisation and Management
1. Corporate Arrangements  
2. Policies and Standards  
3. Indicators and Reporting  
4. Individual Performance  

Index
6 OPERATIONAL SITES
6.1 Site SHE Managers
6.2 SHE Support Team
6.3 Site Health & Safety Committees
6.4 Local Reporting and Data
6.5 Shared Sites and Landlords

7. RISK AWARENESS AND AUDITING
7.1 Risk Awareness
7.2 Risk Assessment
7.3 Auditing

8. HAZARD AND EVENT REPORTING SCHEMES
8.1 Accidents and Incidents
8.2 Near Misses and Hazards
8.3 Routes for Raising Concerns
8.4 Responding to Concerns
8.5 Reporting and the Regulator

9. SHE TRAINING
9.1 Approach
9.2 Training for Safe Working for Employees
9.3 Safety Management Training

APPENDIX A – PARTICIPATING ORGANISATIONS

APPENDIX B – SUMMARY OF GOOD PRACTICES

APPENDIX C - ACRONYMS
INTRODUCTION

1.1 BACKGROUND

Public Concern at Work initiated a programme of research into health & safety cultures in 1995 with four components:

- Theoretical analysis and literature search;
- A postal survey of safety managers;
- A programme of structured interviews;
- Focus group discussions.

The purpose of the research is to inform Public Concern's work generally and in particular to support their preparation of authoritative, comprehensive and practical guidelines to help organisations assess and improve arrangements whereby employees can raise health and safety concerns.

The research programme therefore addressed such key issues as formal and informal reporting, including 'whistle-blowing', proactive measures such as audits and surveys complement reporting, and the preconditions for effective reporting, including safety culture, safety management and risk awareness.

Greenstreet Berman carried out the work programmed in support of phases 1 and 3. The current document reports phase 3. It covers the structured interviews which took place with 20 companies between December 1997 and March 1998 and presents good practices identified by interviewees in event and hazard reporting, and in wider approaches to the establishment of corporate culture, the management of safety, health and environmental issues (SHE) that facilitate such reporting.

Although this study focuses on safety, health and environmental issues, many of the lessons learned will obviously be applicable to defences against other business or individual risks, such as financial malpractice.

A separate report has been issued by Public Concern at Work summarising the lessons from the research programme as a whole.
1.2 REPORT FORMAT

This Section describes the structure of the remainder of the report.

Section 2 provides a summary of the main findings. Section 3 describes the scope of the study and the methodology employed. The remaining Sections then present the interview results and the specific good practices identified against the following headings:

Culture
- Corporate culture
- Importance of good management
- Allocation of resources
- Implementing culture change

Organisational and Management
- Corporate arrangements
- Policies and standards
- Indicators and reporting
- Individual performance

Operational Sites
- Site SHE Managers
- SHE support team
- Site Health and Safety Committees (HSCs)
- Local reporting and data
- Shared sites and landlords

Risk Awareness and Auditing
- Risk awareness
- Risk assessment
- Auditing

Hazard and Event Reporting Systems
- Accidents and incidents
- Near misses and hazards
- Routes for raising concerns
- Responding to concerns

SHE Training
- Approach
- Safety management training
- Training for safe working
1.3 ACKNOWLEDGEMENTS & CAVEATS

We gratefully acknowledge the support of the participating organisations and the contributions of the many individuals who gave so generously of their time. All these organisations were asked whether they would like to be identified. Those that replied in the affirmative are listed in Appendix A.

We wish to make clear that the views expressed in this report are those of the authors, and do not necessarily correspond to those of any of the participating or sponsoring organisations. Interviewees were encouraged to provide examples of good or bad practice from past employers as well as the current one, so the quotes used in this report should not necessarily be linked with the organisations that participated.

The purpose of this report is to illustrate good practice and the problems faced as effectively as possible, and quotations recorded by the interviewers have been edited or re-framed as necessary to anonymise them and translate them to a common terminology.

8 Quotations from the interviewers' notes are shown in this format

For convenience, we have used the terms 'Corporate SHE Advisor', 'Site SHE Manager' and 'Health and Safety Committee (HSC)' throughout, though in reality participating organisations use a wide range of job titles and combine responsibilities for and management of safety, health and environmental issues in a variety of ways. SHE advisors and managers interviewed all had a strong industrial safety focus. Their occupational health and environmental responsibilities were usually less comprehensive.
2. KEY FINDINGS

In the main part of this report — from Section 4 onwards - the results of the survey are summarised by safety management topic. Good practices identified are picked out at the beginning of each section. This section summarises the main findings. The good practices lists are brought together in Appendix B.

2.1 IMPORTANCE OF HEALTH & SAFETY

All the interviewees recognised the importance of safety and of the need to actively manage it and had a well developed industrial safety culture, though sometimes with less focus on occupational health. This was a commercial necessity in many sectors. There were however exceptions, where the management were perceived by their workforce to look no further than avoiding prosecution. No generalisations about size or type of organisation could be made on the basis of our limited sample.

8 If we are unsafe, people of the calibre we need would not work for us and no client would employ us.

2.2 SHE CULTURE

Corporate culture is the major determinant of safety, but SHE culture does not develop independently and improvements to SHE are increasingly just part of the wider performance improvement obtained in cultures which stress empowerment. Culture change requires genuine commitment and active, visible leadership from senior management. An open, empowered culture that promotes ‘constructive intolerance’ of hazards or unsafe behaviour was the ideal for most organisations surveyed. Empowerment does not do away with the need for supervision, even if the approach to supervision changes. The roles of Supervisors and foremen will, in fact, often be enhanced as they take on additional leadership responsibilities and the importance of good, conscientious and safety-aware supervisors and team leaders was mentioned in many interviews.

8 Don't dump it all on the worker - supervisors and management have the responsibility to monitor and intervene.

In planning change programmes, interviewees typically stressed the need for sustainable, continuous improvement rather than ‘quick fix’ initiatives. Older workforces are sometimes said to be more resistant to change, but we interviewed people of all age groups and there was no correlation between age and attitude, though of course it was a far from random sample. It seemed to us that age was no barrier to the introduction of new practice, and that if sufficiently motivated and involved, even the most ‘difficult’ sites with ageing workforces can be turned round. The difficulties experienced by individual managers, union officials and staff seemed less to do with age than with other personal and cultural factors.

8 I could sit in my white tower if I wanted. Things have changed so much, and the job is much more of a burden. I could have walked away (from hazards) many times and said 'to hell with it', but I don't. Others might. [Supervisor]
2.3  LEADERSHIP

Senior management is crucial in shaping the culture. Clear, committed leadership is what everyone looks for. People want to be empowered, but they want to be given a vision and a sense of direction. In a small company, ‘the boss’ defines the culture in a much more direct and visible way, and hence has a greater personal responsibility.

Decisions on promotion and succession management send strong messages. Prospective site and senior corporate managers have to be made to recognise that their success depends on their attitudes to SHE as much as in production results. Participants judged commitment from senior management’s personal, active involvement in safety, the level of resource and time allocated to safety. Sufficient resources must be allocated to SHE management, and to the functions such as maintenance and general services which keep the working environment safe.

Employees frequently spoke of the importance of seeing their senior management in the workplace, taking a personal interest in safety and wider SHE issues.

8  Success depends entirely on the interest and commitment of the department manager - some try, some habitually and seriously violate rules themselves - what message does that send?

2.4  COMMUNICATION

Good communication is essential to good management and efficient corporate performance generally, and to SHE management and performance in particular. It was implicit in much of what participants said about the development of culture, leadership, policy, goals and responsibilities, risk awareness and the reporting of concerns - even if few people made explicit mention of it as a separate topic.

2.5  OWNERSHIP OF SAFETY

Health and Safety is a line management responsibility. It was clear from focus groups, interviews and the postal survey that the successful companies were those where management at all levels genuinely felt a personal sense of ownership of health and safety and continually looked for ways to improve it. Health and Safety Managers have an advisory, supporting and monitoring role, but there was no question of their taking on the responsibility for safety that properly lies with line management. All managers seemed to recognise their legal obligations to both the employees and the public, though some were not sufficiently encouraged to think beyond regulatory compliance.
2.6 HEALTH & SAFETY PROFESSIONALS

In the current climate, it is hard to see how any company can manage without having someone formally trained in at least the basics of safety management and the regulatory frameworks that apply. The Research suggested that medium sized sites should be able to justify a full time SHE professional, and multi-site companies and groups should also have a corporate SHE advisor reporting at the highest level. The site SHE Manager’s job is a very demanding one and requires a wide knowledge of hazards and legislation. Part time SHE Managers struggle if not well supported. The combination of full or part-time Occupational Safety and Health advisors was highly valued where these existed.

8 SHE is not a group priority, so we have no SHE Advisor reporting at a level which can affect resource allocation and corporate targets.

2.7 HEALTH & SAFETY COMMITTEE

All the organisations surveyed had site Health & Safety Committees (HSCs), though HSC business may be covered within broader consultative arrangements. Almost all participants reported a gradual transition from the old fashioned confrontational stereotype towards a much broader joint working party model. The transition from talking shop to proactive HSC was fairly recent in most cases, and interviewees linked it to changes in both management and union attitudes, which generally seem to have been much more confrontational in the past.

8 Shop stewards couldn’t separate safety from ‘shop stewarding’, and managers wouldn’t take responsibility. Now we have managers who get things fixed and (real) Safety Representatives [SHE Manager]

The HSC on sites where team working was established also acted as an umbrella body for project sub-groups which tackled the more difficult issues. One of the main benefits mentioned for an active HSC was the opportunity it gave to involve people in SHE issues and develop their awareness. It helped developed a critical mass of people committed to SHE culture on site.

8 We use multi-disciplinary teams which combine experts and HSC members and affected staff to tackle specific SHE problems [SHE Manager]

The HSC representatives still provided a valuable diverse channel for reporting events and hazards. Where there were still elements of ‘old culture’ management, they may even be the most frequently used channel and had to be determined in championing their colleagues’ concerns. Union backing, even if it were just the knowledge that additional support was available if required, was valuable to them. Because they are accessible and informed, HSC representatives were a valuable source of advice for people who were unsure whether, or how, to report a concern.

8 The HSC reviews incident reports and visits the scene of any event as a committee, and reviews the relevant risk analysis. [SHE Advisor]
2.8 INVOLVING THE WORKFORCE

A common theme in many of the good practices mentioned by participants is that they are intended to actively involve the workforce - and management – in SHE related activities. All participating companies were striving to increase the level of involvement. The HSE was one obvious focal point, but many other initiatives were mentioned. They tended to fall under one of four headings:

- Line management action - actions which demonstrate commitment and encourage participation (such as safety walks, feedback on remedial actions and team briefings etc.)
- Active participation - actions which encourage direct involvement (such as project teams and joint HSEC/management audits etc.)
- Passive routes - initiatives whereby staff can input ideas/concerns at any time (such as suggestions schemes; near miss reports etc.)
- Cultural levers - actions that foster a climate that encourages participation and attention to SHE issues (such as 'slips and trips' weeks; empowerment etc.)

2.9 REPORTING OF HAZARDS AND EVENTS

All organisations had a formal reporting system for accidents and incidents and saw them as fundamental to risk management. In a very few of the organisations surveyed however, the report received still seemed to be considered important primarily as a means to pursue or counter compensation claims.

8 Once it’s on a form, it’s a legal document. It’s not given to union because insurance say not; it’s a claims issue.

Near miss reporting was widespread, though the effectiveness varied. Increasingly, local teams were taking responsibility for identifying and fixing hazards, and for responding to near misses and events in their own workplace. Breakdowns in risk management that lead to accidents and near misses also tended to lead to failure to take corrective action and increase the risk that the true situation would remain hidden. Most schemes allowed for confidentiality as an option but open reporting was strongly encouraged. Employees in our limited sample tended to agree that open reporting should be the objective and that names should usually be included. The point was made, however, that if employees could not trust the normal system to treat them fairly, the normal system probably could not be trusted to keep their identity confidential or deliver any meaningful improvement.

Fairness is necessary, but nobody considered totally “no blame” reporting policies either credible or desirable. However the importance of an alternative reporting route independent of line management for use in serious cases was emphasised by all. The option of reporting directly to the SHE manager or staff is a useful alternative route that could be used informally and with a reasonable degree of confidentiality. Union and Health and Safety Committee (HSC) representatives can also take up cases which people are unwilling to trust to the normal system. ‘Blowing the whistle’ to the Health and Safety Executive (HSE) remains a possibility if all else fails. Smaller companies inevitably had more difficulty in arranging for diverse reporting, but it ought to be possible for even the smallest to find someone willing to be phoned confidentially e.g. a non-executive director or professional advisor.

8 Nobody wants real no-blame. All they ask for is fairness and constructive support for people doing their best.
All participating organisations seemed to be struggling to find suitable indicators of SHE performance. Reporting rates should certainly not be used as an indicator if the effect is to reduce reporting, rather than to focus attention on weaknesses. Integration of SHE targets for groups and individual managers into the normal business planning process conveys many of the right messages and seems very effective.

2.10 RISK ASSESSMENT AND AUDIT

Risk awareness underpins SHE management and the objective should be to implement a structured programme that will produce an enduring impact by involving as many people as possible. Risk assessment is a regulatory requirement, and is also one of the main routes by which hazards are identified. Line managers should be accountable for the completion of risk assessments, but they should be carried out by the supervisors and their teams, with the SHE team providing specialist support. Auditing is important for reasons that go well beyond checking compliance and seeking out hazards. The auditing process stimulates reporting and raises awareness.

8 Audits are an opportunity for people to raise concerns, but they also motivate management to respond to concerns the rest of the time.

8 Audits are as important for the message they send and for the way they emphasise 'keeping on top of it' as for the actual findings.

2.11 RESPONDING TO CONCERNS

The speed with which hazards and faults were cleared after an event, risk assessment or audit result was one of the main indicators employees used to assess the commitment of management to a safe working environment. In the employee interviews, the pointlessness of reporting concerns if nothing was going to happen was the most frequently mentioned demotivating factor, whereas prompt attention strongly encouraged reporting. Even more importantly, prompt attention to hazards directly improves safety and reduces the risks to health and the environment. On many sites, repairs are the responsibility of the maintenance and general service departments, so the speed and effectiveness of their response directly affects SHE performance, as does the professionalism with which their work is done.

8 Issues will only be raised if people see that things get fixed as a result - soon enough for them to associate the two.
2.12 TRAINING

Training is not a substitute for broad experience, but it is an essential part of SHE management. Most organisations had a formal SHE training matrix, covering induction, safety management and workplace safety. Site induction has to re-orient contractors to the client’s expectations and safety management systems. The better organisations looked to develop their HSC members and supervisors as informed SHE champions through additional training and involvement. Organisations should pay attention to the personal development needs and technical awareness of the SHE team; occasional conferences are no substitute for a structured programme. SHE awareness within the management team also needs to be addressed more systematically.

"It’s easier to train managers, because no one notices if they are away for a day - unlike production!" [SHE Manager]

2.13 ORGANISATION SIZE

Our survey covered very small companies as well as very large ones. We found examples of total commitment to SHE and good practice as well as poor practice at both ends of the spectrum. It depended on the culture and the leadership from senior management.

Managers and supervisors in smaller companies were all short of time and found it difficult to keep up to date and to manage safety proactively. Smaller companies may not have the funds to employ specialist consultants or to bring in new equipment, but on the other hand their hazards were usually easier to control and communication of SHE concerns should be easier in a small team.

"I want us to do the right thing, but don’t have the knowledge."

Medium sized sites might have a wider range of hazards on site, perhaps requiring specialist knowledge to manage them safely. One person can no longer be aware of everything that is happening on the shop floor and do all the SHE themselves. SHE management processes and additional resources are therefore required. However many medium sized companies operate in sectors where margins are low, and they may find it hard to prioritise investment in SHE management, training, new equipment, culture change programmes etc. It is all too easy to defer change.

Public sector bodies were prone to overly hierarchical structures and compartmentalisation. It seems likely that big differences in status between levels or types of staff increases the risk of local safety culture breakdown. There is little chance of successfully introducing empowerment and team working under these circumstances. Public sector organisations, though they might be very large and have large overall budgets, nevertheless seemed to be particularly short of resources for remedial measures or external training.
2.14 ROLE OF THE UNIONS

None of the interviewees in this survey voiced any negative sentiments about the role of the unions in Health and Safety management. Inevitably there will be individual union representatives who have not been able to adapt to a more co-operative approach, just as there are on the management side, but all the representatives we interviewed had very positive attitudes to both SHE issues and culture change. In fact, our interviewees tended to feel that union representatives, supervisors and staff had much to gain from a move to an empowered and proactive culture which valued experience and knowledge in the workplace.

The option of being able to report a concern to a safety representative, whether union or not, was valued. The resources of unions and their expertise were drawn upon most heavily where personal injury claims were a feature of the culture.

8 Academics do not on the whole appreciate the role of the unions...

2.15 WORKPLACE VIOLENCE

Violence was only mentioned as a workplace problem in the health and education sectors where it seemed to be a real safety concern. Interviewees were all concerned about it – in particular they all seemed to know someone who had been assaulted by a member of the public.

8 Our second most frequent hazard is violence; reporting is low though, because some people accept it as part of the job.
3. SCOPE AND METHODOLOGY

This Section describes the scope of the interview programme and the methodology used to select the participants and carry out the interviews.

3.1 INTRODUCTION TO PROGRAMME

The structured interview programme followed up previous theoretical work\(^1\) and the postal survey\(^2\) carried out by Public Concern at Work into reporting systems and safety culture. The purpose was to test the results of this earlier work against the views and experiences of other managers and employees and to provide more insight into how the reporting of hazards and events works in practice.

We conducted interviews with participants from twenty companies ranging in size from multi-nationals to very small single-site businesses. The sectors represented were: retail, petrochemical, medical & pharmaceutical, offshore oil & gas, minerals and mining, hotel and catering, NHS and private health care, higher education, mechanical engineering, metal working and manufacture, textiles and clothing, construction, printing and consultancy. Eleven were large organisations or sites which were an integral part of a large group (>1000 employees), four were small (<100) and five were either independent, medium sized organisations or were medium sized organisations within a larger group which operated largely independently. The contribution of the unions was discussed with eight organisations. Union representatives were interviewed at length in four cases.

In each participating company, we started with an on-site interview with the corporate SHE Advisor or the site SHE Manager. For a subset of the organisations, we then carried out a series of short on-site interviews with employees to supplement the main interview and elicit a broader range of perspectives.

3.2 INTERVIEWS

3.2.1 Selection of Interviewees

The initial list of companies to be approached was selected from those respondents to the postal survey that had indicated that they would be willing to participate in follow up work. Recognising the limitations inherent in a small, self-selecting sample, we nevertheless aimed to get a reasonable spread of organisations in terms of type, size, sector and union representation.

Public Concern at Work first wrote to fifteen organisations plus some 'reserves', explaining the purpose and format of the follow-up research and introducing Greenstreet Berman as specialist contractors. In the event, the response was very positive indeed and of those approached, only four declined to be interviewed — all of whom had a plausible reason for it being too difficult to arrange within the dates specified.

\(^1\) Confidential Reporting Schemes: Greenstreet Consultancy Ltd. March 1995.
Seventeen companies agreed to participate, of which twelve agreed to additional formal interviews or informal tours of the site to talk to employees. We then wrote and followed up the letter with a phone call to make the initial contact. A further three interviews were conducted with managers in other companies who heard of the survey and expressed an interest. All of the interviewed SHE managers volunteered to review the draft report and they also asked for feedback on their organisation in the light of the results of the survey.

3.2.2 Interview Protocols

Interviews were carried out at either the organisation’s UK head office or an operational UK site by the same researcher. Except where the interviewees requested it, only the interviewee and the researcher were present, and all the formal interviews were confidential. The interviews took the form of a structured discussion, rather than a strict question-and-answer survey. Strict comparability was judged to be less important than insight and opinion, especially since the management interviewees had generally already completed questionnaires.

Interviews with Corporate SHE advisors and site SHE managers took around two hours, sometimes longer. Topics of interest were generally covered hierarchically, dealing first with strategic issues such as the structure and direction of the business, the approach to SHE management and SHE culture, and the nature of the policy, procedures and resources in place. The composition and role of the corporate and site SHE teams and the Health and Safety Committee (HSC) was explored in some detail. The second part of the SHE Advisor / Manager interviews addressed the topics more directly related to hazard and event recognition and the factors that encouraged or discouraged reporting. This was accomplished by talking about existing systems and initiatives and by discussing case histories that illustrated their strong points and shortcomings. It was made clear to participants that their perceptions of what should be done were as valuable as the information on the current situation, and barriers to improvement.

With other employees and union representatives, the interviews typically lasted around forty five minutes and covered a subset of the issues, drawing particularly on personal experiences to explore perceptions of the conditions that encouraged or discouraged reporting. In one or two cases, the organisation preferred a focus group format with up to eight people present to help with HSC team building, and this was respected.

3.2.3 Analysis

The notes of the interviews were analysed and some 700 observations transcribed into a database format. At this point, they were anonymised to maintain confidentiality for the individuals involved. Observations and good practices were grouped to form the basis of the synthesis presented in the current report.
CULTURE

- Corporate culture is the major determinant of safety. A good SHE culture requires genuine commitment and active, visible leadership from senior management.
- An open, empowered culture that promotes ‘constructive intolerance’ of risk is the objective. Fairness and ‘enlightened response’ is necessary. ‘No blame’ policies are rarely appropriate.
- Sufficient resources must be allocated to SHE management, and to the functions such as maintenance, which keep the working environment safe and respond to concerns
- Empowerment does not do away with the need for supervision. High calibre, conscientious and safety aware supervisors are essential.
- Look for sustainable, continuous improvement. Do not expect quick fixes from initiatives that fail to address the real drivers of culture within the organisation. Support people through the change process.

This section addresses some of the aspects of organisational behaviour that determine the organisational culture.

4.1 CORPORATE CULTURE

4.1.1 Introduction

There seemed to be a common understanding that corporate culture - 'the way we do things around here' - was the major determinant of SHE performance. Interviewees drew particular attention to the need for an effective safety culture, but generally noted that safety culture reflected a wider approach to quality and corporate responsibility.

There are many definitions of safety culture, but the International Atomic Energy Agency's version is as good as any and seems to be consistent with the sentiments of the participants. It says that safety culture is the ‘assembly of characteristics and attitudes in organisations and individuals which establishes that, as an overriding priority, [...] safety issues receive the attention warranted by their significance’.

8 Poor safety is rarely malicious or deliberate; it's because the culture in some way rewards it [Employee]

Participating organisations seemed to fall into three categories: ‘compliance driven’, ‘managed safety’ and ‘constructive intolerance’. Those in the third category had evolved through the other two. There was no correlation between category and organisational size or sector in our sample. No conclusions should be drawn from this though, since our sample was small and self-selected.
4.1.2 Compliance Driven

A few organisations still seem to see SHE as primarily a compliance activity. Regulatory frameworks are translated into internal procedures and then compliance is assured largely by close supervision. The aim is largely to stay out of trouble with the regulator and senior management. Attention to SHE issues tend to be intermittent. Getting concerns addressed is a matter of personal persistence and people had to ‘fight the systems’ to get anything done.

8 Nurses are too busy to stand up for themselves - that needs energy and time they don’t have. [Employee]

4.1.3 Managed Safety

A second group of organisations had moved on and put formal safety management systems in place. These systems generally included mechanisms for policy definition, allocating responsibilities, implementing systems and measuring performance in some way. The organisation could thus move beyond external prescription and set its own targets and standards. However, systematic evaluation of the effectiveness and cost efficiency of the systems was still not common.

8 We believe in coaching, not policing. You still need to set clear expectations of compliance and high standards, but the emphasis is on helping people instead of catching them out. [Site SHE Manager]

8 Old fashioned H&S policies were ‘comply with the law’ - now much more helpful. [SHE Advisor]

4.1.4 Constructive Intolerance

Where organisations had introduced a more empowered culture that devolved increased responsibility to the team level, this was reflected in the approach taken to SHE management. There tended to be more emphasis on local ownership of SHE issues, and on developing risk awareness.

8 The new emphasis is on empowerment, coupled with clear expectations and a focus on behavioural causes of events. [Employee]

8 Working practices and behaviour are much cheaper to change. [SHE Manager]
The aim in such organisations is to encourage 'constructive intolerance' of unsafe or potentially unsafe conditions. This is coupled with a personal and team level commitment to taking responsibility for either dealing with the hazard or ensuring that it is dealt with. All the SHE advisors and managers interviewed seemed to recognise this combination as an important goal, even if their organisation was not yet in a position to achieve it.

8 There is a culture of acceptance – you expect the answer 'not possible to find money'. I wish it were one of intolerance. [SHE Manager]
8 Don’t accept unsafe conditions, and don’t take no for an answer!
8 You have to accept that 'constructive intolerance' means more work for everybody – higher standards are not free! [Quality Manager]
8 People don’t seem to value their own health sufficiently – maybe there’s a macho culture to break? [Employee]

This ties in well with the requirement for continuous improvement that many organisations have now adopted in all aspects of their operations.

8 A culture of continuous improvement is an essential for improved SHE performance. [SHE Advisor]
8 You need a culture of looking for ways to improve jobs. [Quality Manager]

4.1.5 Compliance

The pressure for compliance cannot be relaxed whatever stage a culture has reached, and clarity of expectation in matters such as the use of protective personal equipment (PPE) was held to be a key factor, especially in dealing with contractors who may have to adjust their attitudes considerably when working with different clients.

8 Serious SHE breaches should be a serious disciplinary offence, and this should be made very clear and examples made of the worst offenders. [Employee]
8 We take people off site for bad practice, whether they are contractors or staff. [SHE Manager]
8 Compliance IS important, and contractors sometimes need more of the stick to ensure they do comply. [Employee]
8 All supervisors and management have to keep their eyes open and ALWAYS say something if it’s an unsafe practice – but ask why, don’t just shout, and explain the need to do it safely or provide a solution. [Chief Executive]
8 You can’t be super-critical, otherwise you get disillusionment. [SHE Manager]
An understanding of the reasons why people violate procedures is important if the organisation is to respond appropriately to events and rule breaches or to proactively seek out potential problem areas.

8 The vast majority of events are violations of some type; there is always so much time pressure. [SHE Manager]

8 Defence against violations is multi-layered and stick/carrot: discipline, awareness, task/equipment design and maintenance, adequate resourcing, management priorities, supervision and training. [SHE Manager]

4.1.6 Behavioural Initiatives

The most important current initiatives in the view of many participants were aimed at countering unsafe behaviours of various sorts, such as rule violations and risk taking. They all had a cultural underpinning. The message was that the organisation would not accept unsafe behaviour, and that individual employees had to be ‘constructively intolerant’ of hazards and unsafe behaviour by colleagues and management, as described above. Semi-structured behavioural audits were part of the initial process, though the expectation was that in time peer group pressure alone would be sufficient.

8 The cultural / behavioural science way is the way of the future. [SHE Manager]

8 People who are careless with safety are probably careless with quality - we don't want them. [Chief Executive]

However, there did seem to be a feeling amongst employees that such programmes were targeted at the workforce, when in fact there was an equal need to address behaviours at management level. Unions can have a significant part to play in helping the organisation ensure that such initiatives are appropriate and sensibly introduced, and in monitoring their effectiveness in practice.

4.1.7 Open Cultures and Empowerment

The openness of the culture and ease of communication within the organisation were universally held to be major factors in promoting the reporting of events and hazards. Conversely, where the organisation is too hierarchical or compartmentalised, supervisors and managers may be too closely identified with the problem, or may have too much power of employment or patronage. Under these circumstances it can be very hard to raise concerns.

8 It's the open culture that means that concerns get raised and hence dealt with. [SHE Advisor]

8 A relaxed and open culture is the best way to encourage reporting. [SHE Manager]
Open cultures seemed to be associated with empowerment programmes and team working initiatives. Where these were successful, they were applied to all aspects of the organisation’s activities.

8 The drive for teamwork has improved SHE in many ways. For instance, people now care about SHE because they are looking out for each other. [Quality Manager]

Smaller companies, especially those with stable workforces, seemed to find it easier to sustain the feeling of belonging and mutual support than larger organisations, though it inevitably depended on the style of the senior figure on site.

With empowerment comes responsibility. Managers were keen to stress that they saw ownership by the employees of their own safety as vital in addressing behavioural issues and workplace hazards. Having given people that responsibility however, they have to be supported when they exercise it.

8 The worker MUST be responsible for safety in his/her own work area and MUST own that idea. [Chief Executive]

8 People have to take responsibility for fixing things, not asking someone else to do it for them" [MD]

8 If you want people to take responsibility, you have a responsibility not to undermine them" [MD]

4.1.8 Supervision

Empowerment does not do away with the need for supervision, even if the approach to supervision changes. The roles of supervisors and foremen will, in fact, often be enhanced as they take on additional leadership responsibilities.

8 Supervisors must set clear guidance on ‘how things are done round here’ and be consistently assertive on it. [Employee]

8 Don’t dump it all on the worker - supervisors and management have the responsibility to monitor and intervene. [Chief Executive]

The importance of good, conscientious and safety-aware supervisors and team leaders was mentioned in many interviews. Supervisors may take their lead from management, but they are the constant presence in the workplace and have a powerful effect on team culture. They are the first stop in most organisations’ hazard and event reporting systems, and the attitude they take to such matters – and the commitment they show to fixing problems – can make or break SHE management.

8 The SHE group REALLY works hard on the supervisors, to make sure that they take things seriously (in context of interventions). [SHE Manager]

8 As a supervisor, you have to go round from time to time with a stranger’s eyes, otherwise you just don’t see things. [Supervisor]

8 Some staff do it because they understand why. Some think it’s just my funny way, but they do it anyway. [Supervisor]
Supervisors also have a big responsibility for the induction and initial training of new staff. It's the supervisor's expectations that people have to report to most immediately.

8 New starters work with me a lot. Safety is a practical, experience thing. [Supervisor]

The pressures on supervisors can be intense, so they need support with culture change. The SHE management and maintenance request systems they have to work with must be simple and effective.

8 I could sit in my white tower if I wanted. Things have changed so much, and the job is much more of a burden. I could have walked away [from hazards] many times and said 'to hell with it', but I don't. Others might. [Supervisor]

8 Foremen are intelligent, and do understand cause and effect. It's down to whether it's a hassle to get things sorted and put right. [Employee]

Investment in technical and managerial skills for supervisors, and in their personal development, would appear to be essential. Several participating organisations were trying hard to improve the calibre of individual in the role.

8 The foremen need to really push safety: they are managers in many ways and you need to recruit accordingly. [Employee]

4.1.9 No-Blame Cultures

Many participants mentioned the need for a no-blame culture as a prerequisite for an open culture generally and for effective reporting of hazards and events in particular. However when pressed, it seemed that a culture of 'enlightened response' was what they were really advocating. People generally did not want to see those whose actions put others' lives in danger escaping the consequences. Our conclusion from the interviews was that a 'blame free' culture was generally seen as an inappropriate goal.

8 Blame culture can never be eliminated completely, but you can get a good way towards it - especially with younger managers. [SHE Manager]

8 The company has fair procedures and responds fairly to events. It's not 'no blame though.. [SHE Manager]

8 No blame? No. The discipline option remains and WILL be used if it proves necessary. [SHE Manager]

Cultures cannot be established simply by procedure, so participants were asked how they maintained their 'enlightened response' culture. Education plays a part, but the impression gained was that management commitment to the principle over time was the only way to gain acceptance. In particular, the workforce will draw conclusions from the way the response to incidents involves human error.
One organisation that volunteered an interview has a procedure setting out responsibilities for the development of the culture and explaining what is meant by 'no-blame'. The company encourages the unions to monitor its application. The unions see it as a positive step that empowers the safety representatives. Equally, as one participant noted, the regulator has a role to play in encouraging 'enlightened response' and the promotion of near miss reporting. The regulator has for instance, to respond to near misses in an enlightened way, otherwise the organisation will be unlikely to volunteer information again and it will damage the credibility of the internal culture.

8 Local teams are implementing low-blame well, but Group HQ does not apply low-blame principles to us, and neither does the HSE! [SHE Manager]

4.1.10 Site Sub-cultures

Cultures sometimes differed between sites within the same company, and some participants drew attention to the need to work with that culture, helping it evolve rather than imposing specific solutions from elsewhere. At the same time they recognised that inappropriate sub-cultures can develop and had to be tackled. The management system has to have the ability to detect local breakdowns in SHE culture, and senior management need to be able to satisfy themselves that they would know if there was such a problem.

8 The safety management system must achieve the objectives but be tailored to the local culture. [SHE Advisor]

4.2 THE IMPORTANCE OF GOOD MANAGEMENT COMMITMENT

Senior management commitment is important in shaping the culture. Participants were asked how they judged commitment. Examples given during the survey included direct evidence such as participation in seminars and personal involvement in safety management. Implicit indicators such as the level of resources given to safety and the time allocated to safety training, HSC work or safety improvement teams were also used to judge management commitment.

8 Culture starts at the top. [Employee].

8 [Name] was the right person in the right place and got things moving, but there is so much support and backing from all levels of management. [Employee].

Perceptions of senior management motivation not unnaturally coloured peoples' interpretation of their actions and policy pronouncements. Serious accidents resulted in a flurry of activity that was not always sustained in the absence of a safety management system. Panic measures introduced solely as a result of management realising that they may be at risk of being jailed in the wake of an accident are not likely to be confused with genuine concern for the workforce.

8 A serious incident would galvanise the group management. [SHE Advisor]

8 We had an accident 2 years ago and the CE made everyone go on a 2 day SHE course - nothing since, really. [Quality Manager]
Senior management are quite strongly motivated to avoid prosecutions and compensation claims and SHE professionals tend to play on this. Some interviewees however felt that the ‘fear factor’ could actually set the culture back because of the emphasis that tended to follow on compliance with regulations.

8 I worry more about the loss of my workforce and the pain of injury, but I use the threat of litigation to get money out of the Directors. [Supervisor]

8 Safety? Its paranoia! We live in constant fear of claims. [Employee].

4.2.1 Ownership of Safety

Health and Safety is a line management responsibility. It was clear from focus groups, interviews and the postal survey that the successful companies were those where management at all levels genuinely felt a personal sense of ownership of health and safety and continually looked for ways to improve it. Health and Safety Managers have an advisory, supporting and monitoring role, but there was no question of their taking on the responsibility for safety that properly lies with line management. All managers seemed to recognise their legal obligations to both the employees and the public, though some were not sufficiently encouraged to think beyond regulatory compliance.

8 Department managers MUST own their own SHE and risk assessments, and the underlying policy - SHE is sticking plaster otherwise. [SHE Manager]

4.2.2 Leadership

Leadership was what everyone seems to be looking for. People want to be empowered, but they want to be given a vision and a sense of direction.

8 It all seems to stem from strong leadership on SHE. [Employee]

8 If people are given leadership and support, they respond very readily to SHE. Without it, there is a feeling of helplessness. [Employee]

In a small company, ‘the boss’ defines the culture in a much more direct way, and hence has a greater personal responsibility and must set a very clear example.

8 Small companies depend totally on the boss' priorities. [Chief Executive]

8 Safety culture depends on the boss not falling under a bus. [Chief Executive]

4.2.3 Senior Management Visibility

Active leadership requires more than commitment. It requires visible action. Walkabouts by senior managers seemed much appreciated. Employees frequently spoke of the importance of seeing their senior management, taking a personal interest in safety and asking questions and seeking constructively to understand the reasons for hazards that concerned them. Stories of constructive interventions seem to spread and persist, and help shape the culture.

Conversely of course, poor leadership, unhelpful intervention or a bad personal example can quickly destroy even the best of cultures.
Everybody knows it's a real danger, but no one seems able to stop it happening because it's the man in charge who does it. [Employee]

Success depends entirely on the interest and commitment of the department manager - some try, some habitually and seriously violate rules themselves - what message does that send? [SHE Manager]

4.3 ALLOCATION OF RESOURCES

4.3.1 The SHE Team

None of the participating organisations were in a position to invest much in the way of extra resources in SHE issues. Most SHE Advisors and Managers were under budgetary pressure. 'Downsizing' was either in progress or imminent in all the larger participating organisations, and could have a significant impact on the staffing of the SHE team. Occupational health advisors were particularly at risk where their role was not properly appreciated by senior management, which should be a cause for concern.

Pressure on resources also limits the ability of people to get time off for training and to become involved in a voluntary capacity with site SHE programmes and HSCs.

Location managers are always short of money, so SHE budgets are ring-fenced. [SHE Advisor]

Pressure on resources means staff working on SHE have fallen drastically. [SHE Advisor]

One SHE Manager cannot liaise closely enough with 36 significant departments – we need more resources. [SHE Manager]

Audits could drive improvement, but cuts in resources mean there are fewer staff to do them. Hazard specialists are leaving and the replacements have much less expertise. [Employee]

HSCs and training mean time off the job. Pressure on resources is a real threat. [SHE Advisor]
4.3.2 Remedial Measures

It was sometimes difficult to distinguish between a committed management genuinely strapped for funds and a management which merely gave safety a low priority. Many interviewees expressed their concern about the lack of resources to fund remedial measures. Interviewees frequently passed on anecdotes about postponed improvements or hazards such as lifting and handling, unsafe equipment or lack of ventilation having to be tolerated because there was insufficient money to do something about them. If resource pressures mean there is no money to respond to hazards it ruins the motivation for reporting them and creates a culture of acceptance.

8 Lack of money means real hazards continue to exist. [SHE Manager]

8 If you are short of resources, you are always fire fighting. You can respond to reports, but can never invest the time to put barriers in place to prevent similar problems in the future or work on the change in attitude that may be required. [SHE Manager]

4.3.3 Production Versus Safety

We know from the focus groups and from other survey work that the balance between production pressures and SHE is often a cause for concern, but it was in fact only rarely raised as a problem by participants in this survey, perhaps because of the self-selecting nature of the interviewees. Where it was raised however, the problems were serious:

8 Excessive pressure inevitably leads to short cuts - you can't tell patients to stop being ill! [Employee]

8 Retraining foremen after years of bad leadership is difficult; they have been taught to focus on production for 20 years and it's hard to get them to divert resources to safety. [Supervisor]

8 The aim is to get across the fact that cuts and injuries are actually a huge cost to production, but it's hard. [Supervisor]

4.4 IMPLEMENTING CULTURE CHANGE

Participants readily shared their experience of culture change programmes. Some of it was positive, but other interviewees talked of initiatives that had failed and the reasons why this happened. All stressed the need for sustainable, continuous improvement and pointed to the risks of expecting quick fixes and of overloading people with new initiatives.

'Initiative fatigue' had set in on some sites, where initiatives followed each other too quickly, perhaps without any of them really achieving their objectives. In these cases people were looking for low key, incremental approaches. The high cost of some consultant-driven initiatives was also mentioned as a cause for dissatisfaction.

8 The culture is changing. You have more and more thrown at you and some don't cope because it's so much, so fast. [Employee]
Up to a point, change programmes can be made to work on a piecemeal basis, but most of the successful initiatives described achieved their objectives because the full authority and commitment of the senior management was behind the programme.

8 You can only get so far with a site-by-site approach - a corporate drive and resources are needed for the next step, in part because it's a culture change as well as best practice imposition. [SHE Manager]

It seems clear that the vision and strategy has to be developed first, and that the need for change has then to be demonstrated and accepted within the organisation. It also helped if there was an opportunity to make a break with the past, such as a move to a new building.

8 We used the location move as a trigger for a new culture - helped in part because some who resisted change refused to move. [Employee]

8 Good cultures self-perpetuate through on the job training and cultural 'osmosis' i.e. 'the way we do things here'. Bad cultures also perpetuate themselves though and need a real jolt to change them - new manager or external training/intervention or the HSE. [Chief Executive]

The initial aim was generally to change attitudes and get a cultural shift within at least a critical mass of management and staff, so that new methods of working and managing SHE can be implemented.

8 Work first with the more receptive people; opposition dissolves when you have a critical mass. [SHE Advisor]

8 Constructive attitudes must exist before training, which raises awareness, encourages and adds knowledge and authority. [SHE Manager]

Change is also achieved in part by an accumulation of small examples that show how the new culture brings benefits and so dispels antipathy. It’s a slow process.

8 There are lots of little problems. Fixing some would encourage everyone to tackle the more difficult ones and change the culture. [Employee]

8 Changing the management of safety is like "steering an oil tanker" – it takes a long time to change direction. [SHE Advisor]

‘Old fashioned’ management was mentioned several times as a potential problem in implementing change, though unions were only mentioned once in this context. The perception seemed to be that middle managers in particular had most to lose from empowerment programmes generally, and so tended to be harder to convince. This may or may not be true in practice, but the perception is widespread.

8 Old-fashioned managers can initiate change, but it takes the next generation before they live it. [SHE Advisor]
5 ORGANISATION AND MANAGEMENT

- Appoint a corporate SHE Advisor, skilled in culture change and SHE management, to coach and monitor senior company management and monitor site SHE performance.
- Set up SHE policy teams of senior managers at corporate and site level, to review performance and strategy, and to ensure site management are held to account.
- Set out clear corporate expectations of SHE performance and the general approach to be used, but leave the detail to the sites.
- Use indicators to monitor performance and benchmarks, but be wary of links to bonuses.
- Integrate SHE targets into business plans and individual action plans.

Interviewees provided some useful insight into the guiding principles when it came to developing the SHE components of the organisational structure and the corporate contribution.

5.1 CORPORATE ARRANGEMENTS

5.1.1 Corporate SHE Advisors

The senior management on each location, be it at group corporate, company headquarters or operational site, needs access to SHE support. As always, the SHE Advisor or Manager needs to be close and convenient if they are to be consulted. He or she has to be able to help shape the organisation’s overall safety and monitor the way the management team approaches SHE issues so they can intervene or take steps to improve awareness if necessary.

8 The higher the SHE Advisor reports, the more influence he or she can have. [SHE Advisor]

8 The corporate SHE Advisor meets the MD every 6 weeks to review SHE performance and strategy. [SHE Advisor]

Most senior management teams at group corporate and company headquarters seemed to function adequately with the support of a single SHE Advisor. The corporate SHE Advisor typically had only limited technical and administrative support. In fact, larger groups seem counter-productive because they could start to take too much responsibility for SHE performance. Corporate SHE advisors need to be respected as peers by the senior management team and therefore broad experience and a grasp of strategic cultural and legal issues are perhaps more important than detailed technical knowledge.

8 SHE is not a group priority, so we have no SHE Advisor reporting at a level which can affect resource allocation and corporate targets. [SHE Advisor]
The corporate SHE Advisor will be constantly monitoring best practice and benchmarking progress. He or she will have good relations with professional peers and will usually be the company's representative and spokesperson on SHE matters.

Responsibility for SHE must rest with the line management chain and operational staff. SHE advisors and managers are there to support line management and operational staff in discharging this responsibility. They also need to have the ability to critically evaluate the performance of site systems and personnel, and to support sites from the centre without alienating them.

> Centre supports sites, but is not responsible for their safety [SHE Advisor]

> We don't want TOO much help from HQ. [Employee]

### 5.1.2 Corporate SHE Committees

It is usual for there to be a senior management level SHE policy committee, which reviews performance, policies and strategies – typically this was every six months.

> The VP for Europe meets senior managers quarterly to review SHE. [SHE Manager]

For multi-site companies, there must be a standing SHE working party made up of senior management and SHE specialists from operational site and support functions. Active HSC members were also sometimes invited if their contribution on an issue justified it, or for personal development. This working party typically looks at the practical implications of rolling out new initiatives, harmonisation and cross-company problems. There may well also be an annual safety forum with wider attendance. These things cost money of course, but several of the organisations participating in this survey judge them to be important enough in terms of direct and indirect benefits to bring people together from sites world-wide.

> There is a working party which reports to the European forum of works managers; it acts as think tank and steers development of consistent standards. [SHE Manager]

### 5.2 POLICIES AND STANDARDS

SHE Managers were all familiar with the HSG 65 safety management framework. Alternative representations were recognised, and extensions to cover stakeholder issues, such as the CIA’s Responsible Care programme, were mentioned. However, the basic HSG 65 components of policy, organisation, planning and implementation, performance measurement and review, auditing and evaluation were accepted as valid and used to describe the systems in use.

Most of the interviewees mentioned the organisation’s written SHE policy statements during conversation, but our impression was that it generally only seemed relevant in order to drive the more meaningful documents lower down. We were shown examples of many other documents, but rarely the policy statement.

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Everyone interviewed, on the other hand, spoke at length about the values and beliefs of senior management and the way they impacted on safety. People throughout the organisation have their own practical indicators of senior management values and beliefs – they watched to see what actually happened after events, how resources were allocated when they were in short supply, who was promoted and so on.

Multi-nationals and larger organisations seem to have arrived at the conclusion that the best way to approach the translation of policy into practical behaviour was to develop a company-wide framework of processes and objectives, a ‘blue print for safety’, which was then adapted as necessary, to take account of site-specific factors. One reason put forward was that the separation of operations to reduce liability had lessened direct management control, so a ‘standards and guidelines’ approach had to be developed. Empowerment has to be matched by clear expectations, at the corporate as well as the individual level. Groups of companies or multiple-sites companies that had not yet gone down this road talked much more of variable standards and of an increased sensitivity to personalities.

Policy and targets can be uniform, but the degree of consistency required in the methods of achieving them has to be finely judged. Interviewees with international experience noted that workplace culture can differ markedly even between Western European countries. Behavioural approaches to compliance work well in some places, whereas other cultures are better suited to a rule-based approach. There is also a risk that the best sites can be held back by weaker ones who may, for instance, not yet have developed a sufficiently open culture.

8 Approaches may vary, but you must aim for consistent standards of SHE performance – it takes at least five years in a big company. [SHE Advisor]

5.3 INDICATORS AND REPORTING

5.3.1 SHE Performance Indicators

All the participating organisations were struggling to find suitable indicators of SHE performance. Senior management wanted broad indicators that indicated in general terms where the company was in terms of SHE performance and what the general trend was. Typical questions they might want answers to included:

- How do we compare with our competitors?
- Is our strategic approach delivering?
- Is our culture and our technical safety robust against local failure?
- Is the level of risk and the culture and performance on our sites what we think it is?

8 One of our big problems is to find sensible performance indices. [SHE Manager]

8 Aim for the upper quartile - don't expect perfection. Big gains are possible from modest investment of resources if the will is there. [SHE Advisor]

\[\text{Contents}\]
Site SHE Managers and corporate SHE Advisors look for more detailed information to allow them to prioritise their attention, spot developing problems, evaluate the performance of the SHE management systems etc. They look for indicators of SHE ‘robustness’.

8 Six or so indicators are needed to monitor critical safety functions; audit reports have far too many headings for that job - that’s a common problem across retail and industry. [SHE Manager]

5.3.2 Leading Indicators

It is relatively easy to measure output indicators such as lost-time accident (LTA) or sickness rates, emissions and levels of hazardous chemicals in the workplace. However when accident rates reach ‘background’ level, they are no longer much help in managing safety or benchmarking plants or departments. They are also liable to be distorted by under-reporting or differing definitions when used in league tables or in calculating bonuses.

8 LTA is a lagging indicator; you need a richer set to monitor safety. [SHE Advisor]

8 LTAs are a poor measure for comparison because different sites and countries have different approaches to light duties etc. [SHE Manager]

8 Events are categorised minor/serious/reportable – that’s about as complex as can be understood! - and trends are monitored. [SHE Advisor]

Looking at less serious events, near misses and hazard report rates can provide the missing information, but several interviewees pointed out that they were trying to encourage reporting and therefore could not use them aggressively.

8 If you have no accidents, you have no data that warns of developing problems or sub-cultures, so you must use near misses and audit. [SHE Manager]

8 Reporting levels are monitored - very low levels are investigated as well as high levels, because it may be a culture problem. [SHE Manager]

The results of hazard audits and the speed with which problems were dealt with were commonly used to compare departments and measure progress, as well as giving a crude indicator of the level of personal risk.

8 The challenge now is to prioritise efforts by site or by topic, to get a little better and a little more efficient; indicators are needed to say which in each category. [SHE Manager]

8 Compliance with codes of practice isn’t enough [as an indicator] - taken alone, it just leads to complacency. [SHE Manager]
Other indicators measured progress against planned activity. The number of outstanding remedial actions from audits, event reports or HSC meetings were usually mentioned. Fast, effective maintenance / general services response is essential to eliminating hazards and to stimulating reporting, and was stressed by many interviewees, particularly staff and union representatives. There might be indicators to measure this.

8 We guarantee to make hazards safe within one shift of it being reported. [SHE Manager/Engineer]

Several organisations had previously employed full scope proprietary SHE management audit tools but had since stopped using them on the majority of sites. Once they had done their job in helping drive the introduction of formal SHE management systems, the cost involved, the organisational tensions that sometimes seemed to follow from perceived off-site interference and a perceived lack of relevance had resulted in a gradual phasing out. Use of audit ratings in league tables was also said on occasions to have led plants to chase the areas where it was easier to score additional points rather than addressing those areas where resources would give the most cost-effective risk reduction. Other companies however still found such systems very useful.

8 Activity audits measure things that are done, but the price is VERY heavy. [SHE Manager]

5.3.3 Attitude Measurement

Surveys were also used in various ways to give a measure of underlying attitudes to SHE issues and to get feedback on the management and staff’s perception of the corporate priorities. The information from such surveys can make an important contribution to SHE, and provides one route for spotting deterioration in those cultural and leadership factors that ultimately drive SHE performance. Problems can thus be picked up before they feed through into poor performance.

5.3.4 Evaluating SHE Management System Performance

SHE management systems need to be evaluated routinely at corporate, site and departmental level. Little was said during the interviews about indicators to support the formal evaluation of SHE management systems, although the SHE managers all felt they had a good intuitive grasp of the position.

8 The SHE Manager reviews a selection of event reports and talks to originators / section heads to ensure everyone is happy and that the system is working. [SHE Manager]

5.3.5 Corporate Reporting

If an organisation is taking SHE seriously, it will have a senior management SHE policy committee to review performance. Typically, this group receives a quarterly report from the corporate SHE advisor, who includes data on indicators and serious events.

8 The Group Executive Committee receives a quarterly SHE report, with any serious event reports. [SHE Advisor]
The corporate SHE Advisor has an important screening role here, and must be able to separate out those matters which are appropriate for discussion and action by the policy committee, and which should be followed up directly with sites or with managers or colleagues in other functions. The corporate SHE Advisor will analyse company indicators to identify trends or patterns and benchmark them against the competition.

If there has been a fatality or serious loss, the site manager would be expected to appear before the group to explain the background and the remedial measures. The focus would be on root causes, which may well include inadequate management of SHE systems. Inconvenience and expense should not be a barrier to requiring attendance, because it sends such a strong message to other site managers and candidates for promotion, and the company at large. High performing, international companies seem to require managers to fly from wherever they are in the world to explain events and remedial actions.

8 When senior management say 'don't let it happen again', it shows lack of awareness of how safety management actually works. [SHE Manager]

Where sites are identified as being at risk, best practice corporate response seems to be to investigate rigorously and to hold people accountable, but to be fair about it and to openly acknowledge and address any contributory corporate shortcomings.

8 'At risk' or under-performing sites and managers get more attention and support - support first, but tough action if necessary. [SHE Manager]

8 Senior management response depends on the nature of the event. If it happens despite everybody's best efforts, the Board back the manager. If it's due to poor management of SHE or lack of responsibility, 'the roof falls in'. [SHE Advisor]

5.3.6 Company Annual Report

SHE performance would normally be reported in the annual company report on the basis that management of health and safety is a key aspect of risk management and as such ought to be of concern to financial and shareholding stakeholders. It is also a key indicator of management competence and the quality of operations generally. Typically, the annual report might include a statement of policy, commitment and 'no complacency'. There should be recognition that SHE performance is a valuable indicator of management competence. There may be a comparison of performance with other sectors, and sufficient supporting argument to give confidence that risks to employees and public are being identified and managed.

Many major companies also produce a separate Health and Safety or SHE report, but opinions vary as to its value. The main benefits of a separate report are that it can be targeted at the stakeholders who are most interested in it, including employees, and can deal with the issues in much more depth. The drawbacks are the expense and the resources required. Much of the data is probably already required for other reasons but producing the actual report inevitably involves a lot of extra time and aggravation for the SHE manager, who is probably already short of time.
5.4 INDIVIDUAL PERFORMANCE

5.4.1 Selection & Appraisal

SHE performance depends critically on the quality of the individuals involved, and selection is the first stage in the process. Training is not a substitute for broad experience, so an appointment to a key post such as the SHE Manager needs to be made very carefully. Screening for inappropriate attitudes was mentioned by a few SHE managers and seems essential.

Most companies were contemplating including SHE issues in competence frameworks for selection and appraisal purposes, though progress generally seemed slow. To be effective, training and personal development on SHE issues also must be based on SHE elements in the competence framework. Annual appraisal needs to identify development needs against this framework and to review the individual contribution to SHE performance and achievement of SHE personal targets.

Decisions on promotion and succession management send strong messages, and prospective site and senior corporate managers have to recognise that their success depends on visible commitment to SHE and good safety performance. At least one organisation in the survey had sidelined managers purely on SHE attitude/performance grounds, and noted that this sent a very clear message to the rest of the organisation.

\[8\]
\textit{If a senior manager is not showing commitment to SHE, he or she must be moved.} [SHE Advisor]

5.4.2 Business Plans and Bonus Schemes

\[8\]
\textit{Reward schemes for SHE? Yes we have one. Its called either get it right or leave the site. Keeping your job is an incentive, isn't it?} [SHE Manager]

Opinions differ as to whether bonuses should be linked to SHE performance. There were examples of apparently successful applications, though most seemed doubtful. Part of the dilemma stems from the fact that integration of SHE targets for groups and individual managers into the normal business planning process conveys many of the right messages and seems very effective. It emphasises personal responsibilities for instance, and helps ensure audits and remedial actions are carried out. It also integrates SHE with the personal development and appraisal systems, linking bonuses to achievement of targets and objectives such as the completion of training or audit programmes, especially as part of an improvement initiative.

\[8\]
\textit{The Chief Executive has 30\% of his bonus linked to health and safety performance.} [SHE Manager]
The problems arise because it is difficult to find indicators of SHE performance that are not linked to event rates, and schemes might simply reduce the level of reporting without doing much for risk reduction. Indeed, by breaking the reporting chain, they may actually increase risk. Some sites seem to maintain reporting with such schemes in place, but the culture would have to be very open for it to work, especially at shop floor level where peer pressure could have a serious effect.

8  A bonus related to SHE performance could soon become one linked to SHE reporting. [Chief Executive]

8 Targets are set on managers in the same way as other business plan objectives, and in theory they can lose bonus on them. The quality of reporting is still good, though we do test event reports more to see if they were really work related! [SHE Manager]

Safety managers mentioned many instances where improvements were made at the suggestion of employees. However they were all made in the context of quality teams or Health and Safety Committees. Formal suggestion schemes were becoming less common as management tried to foster the idea that continuous improvement is part of the job.

Production linked bonus schemes generally were treated with some suspicion by those involved with SHE, though there was a recognition that they had their place. Poorly thought out schemes could put too much pressure on staff and management to achieve production targets and affect safety by diverting resources, giving too much priority to production where there was a SHE risk to consider, or by increasing the risks of accidents caused by stress and tiredness.

8  Carelessness and tiredness can kill- don't rush or pressurise people with bonuses to the point where they lose concentration. [Chief Executive]
6 OPERATIONAL SITES

- Site SHE Managers are key individuals. They should be able to advise with authority and competence and be able to persuade all parties to get behind and allocate resources to proactive safety programmes whilst still being willing to challenge unsafe behaviour at any level.
- OSH Advisors and volunteer hazards advisors have a valuable part to play in the SHE team.
- Good site HSCs are working parties, not confrontational talking shops. A co-operative HSC can develop and drive forward improvements and culture change. Involve as many people as possible in SHE initiatives and improvement project teams.
- Prepare regular site SHE reports.
- Maintain a database that supports trending and root cause analysis.
- Don’t ignore the hazards of the car park and shared facilities.

The main focus of the survey was operational sites, although some of these had quite a high proportion of desk based or administrative work.

6.1 SITE SHE MANAGERS

6.1.1 Functional Responsibilities

All the large and medium organisations in the survey had a SHE Manager on each of the main operational sites. Retail outlets, hotels and smaller operational sites had a trained 'SHE Champion' on each site supported by a roaming SHE Manager. The SHE Manager must report at senior level on site.

8 The level the corporate SHE Advisor or company SHE Manager report at has more impact than the resources they have to spend. [SHE Advisor]

The majority of site safety managers and advisors interviewed combined their safety role with other responsibilities, usually environmental issues. This seemed to work well, providing that the site SHE team included someone with the necessary expertise or someone who could act as an informed user of external resources or consultants. Whilst the cultural aspects of improved safety and environmental performance are similar, the technical and regulatory frameworks are very different.

On smaller sites, the SHE manager’s role tended to be combined with other responsibilities which were less obviously linked, maybe security or even general services. In the smallest companies, the site general manager fulfilled all these functions. The main difficulties for those combining roles were time pressures and the difficulty of maintaining sufficient awareness of the legislation and good practice generally. Part time SHE managers relied more heavily on corporate and consultancy support. With good support and in a well developed culture, they may be able to keep on top of the routine tasks, but will be less able to be proactive or spend time developing themselves and other staff.

8 If the SHE Manager is part time, it’s a real barrier to improvement. [SHE Manager]
6.1.2 Approach

The SHE manager is a key player in developing the conditions for effective reporting of hazards and events, and provides one of the main routes whereby concerns can be raised and followed up.

8 Every site needs easy access to a SHE Manager who can advise with some authority and competence. [Quality Manager]

Line management is responsible for SHE, not the SHE Manager, and most interviewees drew attention to the dangers of allowing either managers or the workforce to think otherwise. Having said that, the attitudes and behaviour of the SHE Manager will inevitably set a lead which others will look to.

6.1.3 Advisor to Management

Site management look to the SHE Manager for authoritative advice and guidance, and to ensure that the site is fulfilling all its regulatory obligations.

8 SHE people believe they are there for moral reasons, but what I tell the boss is that I'm here to keep him out of jail. [SHE Manager]

8 I provide an AA/RAC service to managers and staff, to help if there is a problem or if they want advice, or if they need to know what the law is. [SHE Manager]

6.1.4 Visibility and Accessibility

SHE Managers must make it easy for people to report concerns. They can do this by ensuring they are personally well known on site, readily approachable and easy to get hold of. None of the interviewees thought the SHE Manager could do the job from behind the desk.

8 The SHE Manager can't be just a phone number, you'd never ring unless it was 100% life-threatening. [Employee]

Our impression from the employee interviews was that staff would use ‘the system’ for routine reports, but would approach the SHE Manager informally if they had a serious problem – something they would not do if they did not know them. Chance meetings and conversations in the corridor or over lunch seemed to be a surprisingly significant route for raising problems; informal and confidential access to advice is important.

8 The SHE Manager needs to get out and about. Personal approaches and reports come from familiarity and easy access. [SHE Manager]

8 The SHE Manager must be around from time to time on shifts - see things differently and talk to different people. [SHE Manager]
One of the benefits of routine departmental audits is that the SHE Manager has the opportunity to talk to people in the workplace, and to supervisors and managers.

8 Concerns are raised through HSC representatives, but sometimes with the company SHE Manager - the audits mean he is well known. [SHE Advisor]

A big advantage of personal contact over a form or a phone call is that experienced SHE Managers are able to sense the degree of anxiety from body language and ask the right questions. This allows them to pick up on more serious underlying concerns or patterns in the same way that a GP might.

SHE Managers improve the profile of SHE issues and so stimulate reporting by their presence and by the specific actions they take to raise awareness. The consensus was that the SHE Manager ought not to be a 'gatekeeper' for the reporting process. However, all of the SHE managers monitored reports and remedial actions and prepared statistical analyses, looking for trends and patterns in the data and keeping an eye on the effectiveness of the process. If improvements to the process were required, it would be the SHE Manager who would be responsible for developing them.

6.1.5 Championing the Cause

Employees looked to the SHE Manager to ensure that concerns were not 'brushed under the carpet'. The SHE Manager's involvement gave confidence that concerns would be fairly assessed, which encouraged reporting. Most SHE Managers gave examples of times when they had had to act as champions for employees who were having difficulty getting valid concerns addressed.

8 The SHE Manager must know his job and be willing to fight for you. [Employee]

SHE Managers sometimes have to play the 'honest broker' role, supporting line management by helping explain why actions are or are not going to be taken and reassuring people whose concerns proved unfounded. Trustworthiness and integrity are thus important qualities. SHE Managers also have a role in helping discourage trivial or mischievous reports, and in encouraging people to take responsibility for curing SHE problems in their work area as part of their job, only reporting or requesting external action where it was appropriate.

6.1.6 Head of Profession

Some SHE Managers have quite large teams of staff to manage. All recognised the importance of building up a HSC that was a resource for the site and not just a forum for complaints, and some also ran separate networks of informed SHE champions and volunteer hazards advisors. They therefore had to act as 'heads of profession' on site and maybe within the wider organisation for both qualified and non-qualified staff. They had to support and encourage the HSC members and other volunteers, without alienating their line managers or asking too much of them.
6.1.7 Personal Qualities Required

Since many of the interviewees were SHE Managers, they might have been expected to talk about their role. What was surprising though, was the extent to which other employees went out of their way to talk about the personal qualities required of the SHE Manager when they were asked about the things that made a difference to health and safety on site. Almost every interviewee drew attention to the importance of appointing the right person to the job. Their competence and personal qualities seemed to make a big difference to their ability to stimulate feedback and deal effectively with hazard and event reports.

The SHE Manager needs to have the trust of management, workforce and union representatives. He or she has to have credibility as an advisor and mentor to management, but must also have sufficient authority by virtue of his or her personality, position and corporate-level backing to confront other managers and hold firm under pressure if it ever proves necessary.

Influence with management is essential to ensure root causes are addressed, to ensure fair response to events and to secure resources for SHE programmes and improvements.

8 The SHE Manager must have clout and have the backing of senior management - but influence with senior management has to be earned. [Chief Executive]

The SHE Manager must be a figure of authority, ready to challenge unsafe behaviour or inadequate supervision in the workplace or inappropriate management behaviour. Equally though, he or she has to be skilled in empowering and coaching and have the trust of all parties so as to be able to support them and act as their champion if necessary. It is a difficult balance to achieve. One interviewee likened it to being a parent to teenage children.

When employees were speaking favourably about their SHE Managers during interviews, the two things they tended to focus on were ‘genuinely caring’ and ‘getting things done’.

8 The SHE Manager must be available, approachable and get things done. [Employee]

8 The SHE Manager must combine natural authority with understanding and empathy with people’s difficulties, to draw them out on problems which may be quite personal - it’s a difficult job. [Chief Executive]

8 The SHE Manager must be calm, considered and must NEVER shout! [Chief Executive]
6.2 SHE SUPPORT TEAM

8 We’ve doubled the SHE staff. We selected them for their motivational abilities, not their technical qualifications. [SHE Manager]

6.2.1 The OSH Advisor

On several of the sites visited there was a full or part time occupational safety & health (OSH) advisor associated with the SHE team. Monitoring of patterns of ill health was an important part of the SHE team’s role, to detect hazards that may otherwise not be appreciated. This seemed to be much more likely to be done if there was an OSH Advisor, in part because they would be qualified in occupational health matters, whereas the SHE Manager would typically come from an engineering background. Also, their role and the sense of medical confidentiality in their dealings with staff meant that they were more likely to be told of health problems which might be linked to workplace hazards and working conditions, including stress related issues.

On the basis of this survey, we conclude that organisations should consider giving their OSH Advisors counselling training.

OSH Advisors quite often learned of hazards that were not being reported through other routes, especially those with a cumulative effect. Employees might be much less ready to confide in an engineer unless there was a greater degree of certainty about the hazard. The SHE Manager has to report to senior management and to have ‘clout’ within the organisation. Within traditional cultures, this level of seniority could present another barrier in the eyes of junior staff and the option of talking to an OSH advisor is a useful additional channel.

8 The OSH advisor’s role should be to get out and about, to make contact and learn about problems informally. [Employee]

All the SHE Managers interviewed were male, and all the OSH advisors were female. Several female employees said that they found it much easier to approach another woman with concerns. This was especially true where ‘traditional’ workplace attitudes still prevailed, but it still seemed to be the case even where interviewees spoke highly of their SHE and line management.

8 The OSH looks after everyone; she really cares and knows what she’s talking about – almost a counsellor as well as a SHE specialist. That’s very important, especially to the women here. [Employee]
6.2.2 Hazards Advisors

On larger sites, the SHE team might well also include additional technical and administrative support to help operate the administrative systems and carry out audits. Many sites employ hazard advisors, either on a full time basis or as an adjunct to their main job. The most common amongst organisations surveyed were lifting and handling and radiation safety. Hazard advisors seemed to be proving very useful and cost-effective on the sites which used this approach, spreading expertise, experience and helping keep unusual hazards in check. It also provides a useful vehicle for involving senior technical staff in the SHE programme.

8 Lifting and handling advisors make a big difference - everybody should have one, even if only part time! [Employee]

6.3 SITE HEALTH & SAFETY COMMITTEES

6.3.1 Scope

All the organisations surveyed had site Health & Safety Committees (HSCs), although in smaller organisations and sites, the HSC business might have been covered within broader consultative arrangements and be more informal. All interviewees seemed to appreciate that consultation with employees on SHE issues was a legal requirement.

The HSC’s remit was normally confined to health and safety, although there is obvious logic in including environmental issues where the committee is working more proactively. The Corporate Safety Advisor generally monitored the site HSCs and attended occasional meetings – sometimes with little prior notice.

8 Formal HSC meetings with management and informal meetings with just the staff and SHE team members are held on alternate months. [SHE Manager]

6.3.2 Developing the HSC’s Role

Where there was an HSC, all the interviewees reported a gradual transition from the old fashioned confrontational stereotype towards a much broader joint working party model. A typical HSC brought together union and non-union staff representatives, SHE professionals and hazards advisors and management. Formal or informal verbal reports back to their groups by HSC members were seen as an important part of the process. Simply pinning the minutes to the notice board did not generate a sufficient sense of involvement.

8 Need to keep a broad mix in HSC of departments and seniority, bringing in recent recruits for new perspective - an important point. [Employee]

8 It's important that there's someone on the HSC that you actually KNOW. [Quality Manager]

Usually, the senior site manager chaired the HSC and much depended on his or her attitude and ability to lead working parties and drive actions through.

8 People do things after the HSC because they KNOW for certain that the site manager will follow it up and will be unhappy if its been ignored. [Quality Manager]

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The transition from talking shop to proactive HSC was fairly recent in most cases, and interviewees linked it to changes in management and union attitudes, which generally seem to have been much more confrontational in the past.

8 **Shop stewards couldn’t separate safety from ‘shop stewarding’, and managers wouldn’t take responsibility. Now we have managers who get things fixed and (real) Safety Representatives [SHE Manager]**

8 **No complaints come to the HSC nowadays because safety representatives and supervisors sort them out together, though the option is still there. [SHE Manager]**

The HSC generally retained its formal role with respect to consultation with employees and unions on changes and possible new initiatives, but in many cases the HSC had evolved a more proactive role, developing new approaches and driving awareness raising and programme roll out. The best site HSCs sometimes had a role in helping develop company-wide initiatives.

8 **The HSC used to meet quarterly, but now it’s a working group and we meet more frequently as needed for our projects. [Employee]**

Regular HSC meetings which review progress on remedial measures help ensure that actions are carried through. HSCs provide a forum for the discussion of accidents and it is usual for managers to come to the HSC to brief them on any reportable incident and on the remedial measures planned.

8 **Don’t be too dogmatic about reporting routes - people are different and find different HSC / SHE group members more approachable. [Quality Manager]**

It is important to have enthusiastic, interested people who want to work together. People who merely come to the meetings and do not take part in project teams or contribute to awareness raising activities are much less useful and get much less out of the experience.

8 **Too many perks for the HSC reps meant they used to drag out meetings and forgot the purpose. Better to have keener people. [SHE Manager]**

6.3.3 **The HSC’s Role in Reporting**

Union and non-union HSC representatives still provided a valuable diverse channel for reporting events and hazards, as described later in Section 8.3.3. Where there are still elements of ‘old culture’ management, they may even be the most frequently used channel and need to be determined in championing their colleagues’ concerns. Interviewees generally felt that union backing and technical and legal expertise was valuable, where it was available.
On those sites with well developed SHE cultures, HSC members interviewed also felt a wider sense of ownership for the main safety management system reporting procedures, and encouraged people to use them. Because they are accessible and informed, HSC representatives can be a valuable source of advice for people who are unsure whether to report a concern, how to do it, and what supporting information might be required.

8 The HSC reviews incident reports and visits the scene of any event as a committee, and reviews the relevant risk analysis. [SHE Advisor]

HSC representatives are often trained in risk assessment techniques, and help supervisors and managers discharge their responsibilities in this area. They also take part in audits. Workplace inspections may for instance be carried out monthly by an engineer plus a lay member of the HSC.

8 There is an annual plan for HSC coaching. [Employee]

6.3.4 HSC Project Teams

SHE issues are a natural starting point for sites looking to extend cross-functional team working. On sites where team working was established the HSC acted as an umbrella body for project sub-groups which tackled the more difficult issues. Employees are commonly assumed⁵ to be much more willing to get involved in matters of their own health and safety than they are in matters of quality and production, although all three can be accomplished.

8 We use multi-disciplinary teams which combine experts, HSC members and affected staff to tackle specific SHE problems. [SHE Manager]

8 The HSC reviewed 'where are we on safety culture' and each pair of members then works on one aspect of the improvement programme. [Employee]

HSC Sub-groups co-opted non-members with relevant expertise or responsibilities, or sometimes individuals for whom it was thought to be a useful development opportunity. One of the main benefits mentioned for an active HSC was the opportunity it gave to involve people in SHE issues and develop their awareness. It helped develop a critical mass of people committed to SHE culture on site.

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6.3.5 HSC Resources

Time spent on HSC and SHE initiatives is time away from other tasks. A number of interviewees pointed out that contributing to the development of SHE within the organisation should be included in job descriptions. It would be unreasonable to rely on voluntary ‘out of hours’ effort for activities which contribute so directly towards business objectives. Effective HSCs therefore depend not only on the enthusiastic support of their members, but also on their supervisors and managers and thus ultimately on the personal commitment of the senior site manager to the process.

8 The new HSC takes more resources from the shop floor but the benefits are considerable. [Employee]

8 HSC members are being used more and more, and it must be seen as part of their job - not a voluntary extra. [SHE Manager]

6.4 LOCAL REPORTING AND DATA

6.4.1 Site SHE Reports

As at the corporate level, it was usual for there to be a site management level SHE policy committee, which reviews performance, policies and strategies on site, typically every six months and timed to review the information being passed up the corporate chain to the corporate level equivalent.

8 There is an annual report from the SHE Manager to the site SHE policy committee. From there, it goes to the senior management forum, but [regrettably] it gets little attention at that level. [SHE Manager]

In addition to routine reports to site management, the site SHE Manager usually has responsibility for preparing an annual site SHE report, built up from information in the SHE management system which is reviewed with the HSC before being presented formally to the site policy committee. It seems good practice to include SHE objectives and stewardship reports from the various departments, to stimulate involvement and provide a convenient focus which helps persuade departments to complete their programmes.

An annual report is insufficient to maintain hazard awareness and awareness of systems and initiatives, so all sites with an active HSC provide much more frequent feedback to the workforce by various routes.

6.4.2 Databases

Amongst the participants, only the nuclear industry seemed to have a fully comprehensive hazard and event database. Our impression was that it was cross-company and covered good practices as well as events. Most of the participating organisations did not operate event and near miss databases designed to support root cause analysis, which was a somewhat surprising finding.
The cost of designing and maintaining a database, and the cost of collecting, coding, entering and verifying historic and future data was one factor which appeared to put companies off.

8 An event / indicator database must be very simple, and part of an integrated risk management database including insurance and security data. [SHE Manager]

The use of event and near miss data to estimate human error or other failure probabilities for numerical reliability assessments was only mentioned by one of the participants in this survey, and it is unclear whether even the high hazard industries can do this effectively because of the difficulties and costs involved.

However, near miss reporting schemes do capture in a qualitative sense many incidents which would allow the organisation to improve its risk analysis and give feedback to designers. Some near misses constitute significant erosions of safety margins and, particularly in the nuclear industry, this may result in a serious investigation and regulatory interest - perhaps even grounds for prosecution. This poses obvious difficulties in maintaining open relationships between the company and the regulator.

In some organisations, insurance teams were proving to be strongly supportive of the SHE function, as indeed they should be, and were a major driving force behind the integration of risk management and the development of usable risk management databases.

8 A risk management database is being developed, with insurance as the driving force. [SHE Manager]

6.5 SHARED SITES AND LANDLORDS

A few of the larger organisations and most of the small ones shared sites or common areas with other organisations, but there did not seem to be much co-operation in most cases. There would seem to be scope for closer liaison and shared services or expertise.

8 We need to co-operate with neighbours in risk analysis on shared sites and car parks. [Chief Executive]

Many small companies rent facilities on an industrial estate or in a business centre, and landlords are not always responsive to a company’s requests for safety improvements. One explanation put forward for this is that companies benefit commercially in a wide variety of ways from investment in SHE and loss prevention – SHE provides a commercial opportunity and justifies investment well beyond minimum compliance requirements. Landlords, however, do not obviously share in these benefits to the company and so are less likely to want to spend more than is required by regulations unless tenants place a higher priority on SHE matters. Closer liaison between tenants may have some effect.

8 In the end, we couldn’t take the risk any longer and decided to call in the HSE. The landlord would have made life difficult for us if we had complained and so we ‘blew the whistle’, but maybe we just lacked the courage to take responsibility? [MD]

Lack of awareness amongst landlords is also an issue; they are unlikely to have been trained in SHE management. In at least one case, the landlord seemed to be unaware that he had any responsibilities for safety on his sites beyond complying with fire regulations.
Car parks were an underrated hazard on almost every site visited. It seemed common to find that a significant proportion of slips and falls happened there, and moving vehicles pose an obvious risk. Accidents in car parks do not usually count as workplace injuries so it is important to guard against the temptation to 'relocate' accidents there. Some companies do not count accidents in car parks or outside the workplace in their statistics, particularly if the company were not at fault. This may be acceptable for formal reporting and claims purposes, but the SHE management system should respond to them. The car park was certainly a genuine area of concern for several of the SHE managers interviewed. For shared sites the situation is complicated by the fact that ownership of the car park, and therefore ownership of safety there, is blurred and may well be in part the responsibility of an absentee landlord.
7. RISK AWARENESS AND AUDITING

- Risk awareness underpins SHE management. Institute a structured programme that will produce an enduring impact by involving as many people as possible.
- Line managers should be accountable for the completion of risk assessments, but they should be carried out by the supervisors and their teams, with the SHE team providing specialist support.
- Auditing is important for reasons that go well beyond checking compliance and seeking out hazards. They stimulate reporting and raise awareness.
- Effective routine maintenance programmes and quick response to faults, breakdowns and concerns are just as important to SHE performance as SHE management systems - invest in them.

This section presents the results of the survey relating to some of the key safety management functions on operational sites.

7.1 RISK AWARENESS

Risk awareness underpins SHE management. Without an aware management team and workforce, risks will go unrecognised, unreported and untreated. Risk awareness is not specific to one class of consequence - the same hazard can threaten production, worker or public safety, the environment and corporate reputation depending on how it is manifested on the day.

8 Most poor safety here is ignorance - they just don't see it as a problem. [Employee]

SHE managers saw developing programmes to improve risk awareness and its promotion as key parts of their jobs. A wide variety of potential initiatives were mentionaed, including special weeks such as fire week or a 'slips and trips' week, to raise awareness and involve people. Roadshows, exhibitions, special issues of newsletters, tool box talks and video presentations were also mentioned. Involvement is the key.

8 SHE project team membership is more effective than training because it raises hazard awareness more generally and the effect is longer lasting because it's experienced as opposed to learned. [SHE Manager]

8 All work orders have a space where operators are asked how it could be done better - people use this system and it creates involvement and awareness. [Quality Manager]
7.2 RISK ASSESSMENT

Risk assessment is a regulatory requirement, and is a major activity on sites. It is also one of
the main routes by which hazards are identified. The aim is to complete, document and use a
comprehensive analysis of all the significant potential SHE hazards on site.

7.2.1 Carrying Out Assessments

Although generic risk assessments were sometimes provided by corporate or site SHE teams,
all the participants agreed that the risk assessment should be owned by the team or individual
whose work area was covered. Responsibility for ensuring that they were done, however,
clearly rested with line management. They were accountable for the currency and quality.

8 The risk assessment for new equipment would always be talked through with the
prospective operator, so he owns it and can advise on the basis of experience.
[Employee]

8 Risk assessments need to be done locally to ensure ownership and to give them a
chance of being updated . [SHE Advisor]

8 Supervisors did the risk assessments after being trained – they need to do it properly
and need to be supported. [Quality Manager]

Under these circumstances, risk assessments allowed employees a good opportunity to raise
concerns and discuss their experience, including accidents and near misses, in a non-
judgmental context. Instituting a process of rolling review therefore complements the
reporting process and awareness raising as well as being an important means of keeping
assessments up to date.

8 Risk assessments bring out near misses if they are done with the team. [Chief
Executive]

7.2.2 Specialist Support for Assessors

The SHE Manager was naturally expected to be well trained and experienced in risk
assessment techniques, able to provide support and advice to those carrying them out, with
additional help from hazards advisors if required. However HSC members and / or SHE
champions were also usually trained in basic risk assessment techniques so that they could
help within their departments.

8 SHE champions get basic training on risk awareness / risk assessment. [SHE
Manager]

Risk assessment can take up a lot of time, so it should be carefully planned and the approach
to be taken, the training programme and the documentation scheme need to be thoroughly
worked through in advance. Risk assessments should not be overly complex.

8 Risk assessments can take huge amounts of time, so be systematic, prioritised, and
give guidance and training. [SHE Advisor]

8 Assessors need to be risk aware and understand hazard/risk/consequence – its hard
enough even for the professionals! [SHE Manager]
7.3 AUDITING

7.3.1 Purpose

Interviewees placed a lot of emphasis on auditing and this is reflected in the length of this sub-section. Audits were seen as a way of identifying hazards directly, but they were definitely not seen as alternatives to hazard and event reporting. In the better developed cultures the emphasis was on using audits for awareness raising and the stimulation of informal hazard and event reports rather than policing the paperwork.

8 Audits are an opportunity for people to raise concerns, but they also motivate management to respond to concerns the rest of the time. [SHE Advisor]

8 Audits are as important for the message they send and for the way they emphasise 'keeping on top of it' as for the actual findings. [Employee]

An imminent audit naturally provides a convenient focus for action plans and encourages departments to get the paperwork up to date at least once in a while.

8 HQ audit staff just focused on our paperwork - we had to educate them on practical hazards and constraints. [SHE Manager]

8 We are looking to do more auditing, not to police more but to get out and about more, to look for hazards and improve matters. [SHE Manager]

7.3.2 Audit Methodologies

The audit methodology used in most cases had been developed by the site SHE manager from generic checklists of various sorts. Audits sampled SHE management system documentation, but the emphasis seemed to be on checking for hazards and on talking to staff and management in the department being audited. Linking the audit to the risk assessments kept the risk assessments relevant, as well as being the obvious framework for checking hazard management.

Audit programmes varied in their timing, but needed to be reasonably frequent to keep awareness and standards high. A typical programme mixed announced and unannounced ‘full scope’ audits. Auditing usually, but not always, extended to contractors. It seems logical that it should, however. Building or construction work on sites can be a particular hazard, with inspections perhaps once a week at least.

8 Each unplanned audit takes 1 day, but you know what you’re going to find after the first 10 minutes. [SHE Advisor]

8 People may object to unannounced audits, so the instruction must come from the top and the top must come down hard on department managers who refuse to co-operate or respond to findings. [Employee]
Whatever the nature of the audit or walkabout, those involved generally stressed the importance of talking to people and asking why things were the way they were. Compliance audits by remote figures would not achieve the full range of benefits.

8 People need time to explain the reasons for problems, to avoid alienating them and to enable us to get to root causes and help find remedial measures. [SHE Manager]

The sooner the results are passed back to the department audited, the better. Results were typically made available to the next HSC, which discussed the findings and trends, and any possible reasons. The overall results would usually be reported back to the corporate SHE Advisor, who would be informed about progress on any major problems revealed.

8 Routine audits are carried out by HSC members; presenting findings ON THE DAY keeps it immediate and is more effective. [Employee]

Audits that result in large numbers of trivial findings and remedial actions will quickly fall into disrepute. Whilst nothing significant can be allowed to go unchallenged, it is important that remedial programmes are realistic. They should be closely monitored. Actions must be followed through rigorously. Where there was an effective quality management system, it was used to progress all actions, whether originating from SHE audits or from any other source. It seems sensible to use site business planning and quality management processes wherever possible to deliver SHE management objectives. Add-on systems need extra resource and are liable to be less efficient.

8 Performance is strongly linked with audit frequency / rigour of follow up, and these are resource limited. [SHE Advisor]

8 There are HSC audits every 6 months, but the system tends to become discredited because there's no pressure from management and no resources to fix things. [SHE Manager]

7.3.3 Audit Personnel

For larger sites, the audits were usually carried out by on-site personnel, but the corporate SHE Advisor should at least sample the audits to ensure quality is being maintained and confirm that the auditing programme is actually being carried out.

Auditors must have a sense of proportion and be able to distinguish between important and trivial problems. Those doing the auditing have to be competent to do this job, and it may not be easy where unusual hazards – e.g. microbiological hazards – are involved. Audits are an opportunity for experts to provide an in-depth check for hazards that a department might not be able to recognise. They have therefore to be carried out by people who have the necessary expertise, who understand the risk assessments and who can spot technical hazards not covered by existing risk assessments. They may need to involve hazard advisors or external consultants.

8 Audits picked up the little things - the trip hazards and the incomplete forms - but the expertise wasn't involved which would have seen the really dangerous working practices - and so nothing changed. [Employee]
Full scope audits are supplemented by more frequent inspections, audits and safety walks. These may be carried out by managers, supervisors, SHE team and HSC members. These walkabouts do detect some hazards, but their primary purpose is to involve management and staff together, and to give management an opportunity to show leadership and commitment. Departmental self-audit in various forms was also a common feature, as was routine sampling for hazards such as noise, dust and chemicals etc. With all audits it is important to maintain the audit schedule. Letting them slip sends a very clear negative message i.e. – safety related actions can be deferred if there are other pressures.

8 HSC audits include people who are not on the committee, to widen experience and awareness and ownership. [Employee]

7.3.4 Routine Maintenance

Hazard checks of equipment and the physical environment should be part of the routine maintenance schedule. Regular inspection and maintenance of equipment clearly plays a part in maintaining safety. Failures can be dangerous in themselves, or safety devices can fail. Failures can lead operators to find non-standard and potentially risky ways around the problem. Trying to unjam machinery without isolating it is risky, but if the root cause is that the machinery jams because of poor maintenance the blame should not be placed on the operator if there is an accident.
8. HAZARD AND EVENT REPORTING SCHEMES

- Reporting schemes must be simple to use and provide diverse routes for raising concerns.
- Near miss and hazard reporting is essential, but effective screening and prioritisation is needed.
- Local teams can take responsibility for identifying, assessing and responding to concerns in most situations.
- There must be a confidential option for reporting concerns, although open reporting should be the objective. Anonymity should not be encouraged.
- Fast and effective response to reports of hazards is a powerful motivation for improved reporting, and makes the workplace safer more quickly. Fast maintenance was frequently mentioned as one of the keys to safe working.
- Attention needs to be paid to keeping awareness of reporting schemes high, to providing quick feedback to originators, and to disseminating the lessons from events.

This section was the main focus of the project, and it was the area we explored in most detail during employee interviews. The results of those discussions are reflected in all sections of this report. The current section pulls together some of the specific issues raised concerning the operation of formal reporting schemes.

8.1 ACCIDENTS AND INCIDENTS

8.1.1 Reporting

All the participating organisations had a formal reporting system for accidents and incidents. At its simplest, this might be an accident book that was regularly reviewed by management, unions and the HSC. More usually, there was a scheme which relied on a form being completed and distributed to interested parties. Accident and incident report forms need to be extremely easy to use and widely available.

*It is very difficult to report an accident - who needs a 6 page form at the end of a long shift! [Employee]*

The extent to which an individual fills in the entire form seems to depend on the extent to which they can be expected to understand the issues involved - which in turn depends in part at least on the training given - and on the degree of root cause analysis required on the form. It also reflects the prevailing culture, of empowerment or control. However signatures may not merely be for bureaucratic purposes. There will usually be a requirement for comment on the event and the remedial measures being taken. Signatures may serve to affirm accountability for local investigation and remedial action before the form is passed on for central analysis.

*Event and near-miss forms are held by first aider, filled in and signed by safety representative, line supervisor and witness. [SHE Manager]*
Accident reports in a very few organisations seemed to be considered important primarily as a means to pursue or counter compensation claims and this was a major factor in the way they were used. In these instances, the schemes had fallen into disrepute as far as employees were concerned. Conflicts in priorities between insurance and legal teams and the SHE functions were mentioned as a potential problem by some of the interviewees, particularly those with less open cultures.

8 Accidents? Well, you fill in the form and leave the manager and union to deal with it” [Employee]

8 Once it's on a form, it's a legal document and it is not given to union because the insurance team say not. It's a claims issue. [SHE Manager]

8 People are reluctant to fill out a form in case it is used against them - there are insurance implications – they prefer to sort out near misses within the team. [SHE Manager]

The means employed to maintain awareness of these options included: notice boards, posters, videos, induction courses, safety training, supervisors. Safety manuals and procedures also had an effect, providing they were used.

8.1.2 Investigation

Different lessons need to be learned at different levels within the organisation. The circumstances surrounding a near miss will normally be discussed at the local level, whereas engineering and corporate functions will be more interested in new problems or trends. At a higher level, managers will be looking for feedback on the impact of their decisions, such as the balance between safety and production. Breadth of vision is required to ensure that indications of organisational failure and reduced risk margins are detected, as well as the more obvious immediate problems.

The initial investigation would be by the supervisor or departmental manager, depending on its severity, supported by the SHE team. This enhanced local ownership of the problem and its solution. Most organisations provided training in investigation techniques to those who may be involved. This would seem essential, especially if the real root causes are to be identified – root causes that might well be organisational in nature.

8 Supervisors investigate and recommend/implement remedial measures on near miss reports, managers on reportable events. [SHE Manager]

8 The line manager has to come to the HSC and explain results of investigation and proposed response to reportable accidents. [SHE Manager]

The site SHE Manager collated the information on site. For accidents of any significance, the corporate SHE advisors would also take a close interest in the progress of the investigation and in the implementation of remedial measures. It was part of the SHE Manager’s function to ensure that the full implications of the event were identified and the potential impacts under different circumstances considered.
8 Event investigations are sympathetic and fair, but must get to the truth. [SHE Manager]

8.2 NEAR MISSES AND HAZARDS

8.2.1 Near Miss Reporting

A near miss is an event which did not lead to reportable loss or injury, but which could have done so under different circumstances, and so is indicative of a potential organisational weakness. Near miss reporting is one of the main lines of defence against some specific sources of risk, including latent failures. Organisations with well developed safety cultures tend to adopt a very broad definition for near miss reporting, and they also use integrated near miss / minor event schemes to obtain feedback on safety management or safety culture deficiencies. People tend to under-estimate risks in well-defended systems, and the circulation of near miss reports stops people becoming complacent in the absence of accidents.

Interviewees were clear that everybody within the organisation has to understand how SHE is managed and the importance of reporting hazards and events. However in reality, most tended to limit their discussion to reporting by ‘shop floor’ staff and supervisory grades. All grades of staff and managers are in a position to observe hazards and failures of safety management, and must act on what they observe. Management systems fail and managers exhibit unsafe behaviour, just as their shop floor equivalents do. Designers and managers experience ‘near misses’ and may build latent failures into the system. Corporate events and hazards therefore have to be fed into the system just as much as operational events and hazards need to be. The same attitude of constructive intolerance needs to be prevalent within corporate functions as on the shop floor.

In any highly defended system the incidence of actual accidents or loss is likely to be very low, and hence it is important that near misses are considered and understood. Indeed, as safety management improves, so the importance of near misses as a source of data also increases. Much has been written about the importance of near miss data collection, and there is little doubt that it should form an integral part of any safety management system.

8 Near miss reports allow us to monitor trends now we have a low accident rate. [Employee]

8 Near misses and dangerous occurrences are recorded on a 1 page sheet - what/why/action if necessary. [SHE Advisor]

Most of the organisations surveyed had a form that could be used for near miss reporting, but the systems were generally much less well developed than those for accident reporting and less well known. There seemed to be considerable scope for improvements.

8 Near misses are investigated by HSC, there is no company-wide form. [SHE Manager]

8 The near miss system is going over to a networked database which anyone can enter into and read from. [Employee]
All the participating organisations were trying to improve near miss reporting. An open culture is essential, but better awareness of the reasons for reporting near misses also helps. Accidents may be obvious, but near misses may not. Without greater awareness, the workforce will not appreciate the significance of the things they see and the organisation will not be able to use the information obtained.

Improved general risk awareness was also a common objective. A certain level of awareness is necessary before any reporting scheme can operate effectively, but once the threshold has been reached, increased participation in reporting and remedial programmes plus exposure to feedback was said to improve awareness further - there is a positive feedback effect.

Even a well run site can generate a large number of near miss reports and so swamp the resources available to analyse and respond to them. A rapid response is important, even if it just acknowledges the report and says that it is included in the data for analysis. Remedial action will also be needed in a percentages of cases, but the numbers of reports involved mean that a screening stage has to be included.

8 Good near miss report schemes can overwhelm you with data (900+ per year). [SHE Manager]

One company included a consequence/frequency matrix on the reporting form and was providing appropriate training for all operational staff in risk assessment, in part to help alleviate this problem.

8 All events are rated on an actual severity scale (1-5) and on a potential severity scale (1-5). [SHE Manager]

8.2.3 Team-based Approaches

Although accident reports still reached the SHE team, two organisations reported sharply falling numbers of near miss reports. When the formal near miss scheme was first introduced, there were few reports because the culture was not right and people did not see the point. Then as the culture became more open and aware, the number of reports reaching the SHE department increased dramatically. Nowadays though, supervisors and their teams work together to identify hazards and do something about them as part of their normal activities, and the formal scheme is again seen as less relevant. Reports of events involving injury or loss, or events with wider significance, would still be passed into the wider system.

8 We could be swamped with near miss reports, so we are moving towards reviewing them and taking responsibility at team level, as part of a wider team working initiative. [SHE Advisor]

The trend within participating organisations was for teams to take the responsibility for identifying and fixing hazards in their own workplace, and for responding to near misses and events within their area of responsibility whenever practicable. This approach develops ownership and is often very effective, but it depends on real empowerment and on the team having a strong internal safety culture and expertise in screening. It also reduces the information the SHE Manager can use to spot developing patterns across the site. Arrangements for tracking remedial actions need to be applied in a disciplined way and must be supported by audit.
8.2.4 Anonymity and Confidentiality

The option of anonymity exists within any reporting scheme under most circumstances. The person filling in the report merely leaves their name off or writes a letter, rather than using the official form (which may normally be filled in or counter-signed by the supervisor).

Any good scheme will take note of anonymous reports, even though anonymous reporting is unlikely to be encouraged. The main problems with anonymous reports are said to be that they have less credibility, they usually omit vital background – sometimes deliberately to avoid identification - and there is no chance to get further information. Users need to be educated as to the reasons why anonymous reports should only be submitted as a last resort. US practice sometimes includes ‘hazards’ boxes around the site which employees can put simple hazard / near miss forms into anonymously if they wish. UK experience with such schemes has been mixed.

The option of confidentiality reduces the need for anonymity and gives people an alternative. Confidentiality usually means that the name of the reporter is known to the co-ordinator of the reporting system but not to management or colleagues. Confidentiality is considerably harder to organise than anonymity. It requires more trust in the arrangements and - since people may feel they are taking a risk when reporting - high profile management commitment to taking action on the basis of reports. The interviews followed up the questions asked in the postal survey, which had suggested that people might prefer to report confidentially when:

- the event is personally embarrassing;
- they fear disciplinary or legal penalty;
- colleagues would make fun;
- they are reporting someone else's error;
- peer groups do not support reporting;
- uncertainty exists as to significance;
- the event is a near miss or unsafe act; or
- rules or regulations have been violated.

In the event, the companies in this survey seemed to see no need for confidentiality as the default. The openness of the culture was said to make it unnecessary. Most schemes allow for confidentiality as an option but open reporting was strongly encouraged. It might be that an emphasis on the confidentiality option would anchor a culture and stop it moving on to open reporting. In most cases, employees interviewed agreed with this analysis and seemed to think that if they couldn’t trust the system not to treat them fairly, it couldn’t be trusted to keep their identity confidential and they would simply not use the system.

8 We want to promote an open culture, so we encourage people to report openly - when they are well treated, it allows us to send a positive message and keep on the upward spiral. [Quality Manager]

8 Complaints might be confidential in the office, but would they be in the pub? [Chief Executive]
8.2.5 Reporting Hazards

The term ‘hazard’ was used in a fairly narrow way, by most of the interviewees, and the scope of hazard reporting schemes tended to be fairly limited. Reportable hazards might arguably include difficult tasks, inadequate training, poor procedures, organisational failures, and cultural problems such as lack of commitment to safety.

Hazard report forms have an advantage, in that they allow trends and patterns to be monitored easily and actions to be tracked. Formal systems allow the organisation to demonstrate to the regulator that it has a comprehensive SHE management system. Forms need to be extremely easy to use and widely available. It must therefore be straightforward to report hazards and to request action, and individual employees ought to be able to do it without having to obtain formal authorisation. Acknowledgement of receipt must be quick and the author needs to be kept informed of progress on the concern.

8 Simple usable systems will be maintained, bureaucratic procedures will fall into disuse and disrespect. [SHE Manager]

Almost all of the organisations interviewed had such a form, but the extent to which it was used varied considerably, depending on the alternatives available and the effectiveness with which written reports are dealt with. In practice the efficiency of the maintenance / general services request system has a much bigger impact on hazards.

8.2.6 Routine Questionnaires

Some organisations make good use of proactive audits of incidents and near misses. The reporting process in selected areas is supplemented by questionnaire or interview based surveys where it is considered that there might be under-reporting, to identify problems and the reasons for under-reporting. Such surveys are usually undertaken on a confidential basis to facilitate free use of the information gained. Questionnaires are typically used, although there is some suggestion that interviews are more productive than written reports. None of the participating organisations appeared to have a formal routine scheme of this nature, but some did seem to operate informal equivalents.

8.2.7 Suggestion Schemes

Separate suggestions schemes are another means by which employees can get improvements implemented. Interviewees mentioned many instances where improvements were made at an employee’s suggestion, but as far as we could determine, they were all made in the context of quality teams or the HSC. Formal suggestion schemes seemed to be becoming less common as management tried to foster the idea that continuous improvement is part of the job.
8.3 ROUTES FOR RAISING CONCERNS

8.3.1 Line Management

Breakdowns in risk management that lead to accidents and near misses tend to lead to failure to take corrective action. They also increase the risk that the true situation will be concealed. Management must always ask themselves the question: ‘if near misses had occurred and a serious safety hazard was being covered up, how would we know?’ To be robust in the face of a local breakdown in management control, reporting routes must be diverse with an alternative reporting route independent of line management, and capable of reaching beyond any local breakdown. Diversity is essential to cover different situations and different personalities.

8 Don’t be too dogmatic about reporting routes - people are different and find different HSC/SHE group members more approachable. [Quality Manager]

In most organisations, the first step in raising a concern or reporting an event or near miss would be to go to the supervisor. The supervisor therefore has a very considerable influence on reporting. If there are personality difficulties, or if reports are not taken seriously, reporting will soon drop off. For accidents, it was usual for it to be the supervisor who compiled the accident report and did the initial analysis.

8 Our supervisors ENCOURAGE people to bring up concerns - it prevents accidents. The supervisors are crucial.

It was common for procedures to specify what the employee should do if he or she gets no satisfaction from the supervisor when raising a concern. Typically, the preferred approach was to work up through the management chain.

8 The company has a clear set of expectations. On reporting, we are told we MUST keep going up the line until a SHE problem is fixed. [HSC Rep]

8.3.2 Reporting via the SHE Manager

Early warning of poor practices or breakdowns in safety culture may come from analysis of events or near misses, or it may come directly from ‘whistle blowing’ reports of practices or management / supervisory attitudes. The option of reporting directly to the SHE manager or his staff was seen as offering a useful diverse route that could be used informally and with a reasonable degree of confidentiality. This route is difficult to integrate formally into the SHE management system, in part because of the difficulty in defining what needs to be reported, but it provides an important alternative route and in all the larger organisations surveyed, there was an in-house ‘hot line’ option for raising such concerns direct to the SHE team.

8 The corporate SA is told things in confidence, but only if he is on-site. Very rarely by phone or form, so get about! [SHE Advisor]

8 The option of phone link to SHE Manager is vital. [SHE Manager]

Hot lines are not just an ‘emergency route’. The phone-in option seems ideally suited, for instance, to organisations where there are a large number of field staff and team level resolution is impractical.
The direct phone-in hazard report system is important to proactive safety - no bureaucracy and no delays. [SHE Manager]

8.3.3 Reporting via HSC and Union Representatives

All reporting is not by formal written report. Participating organisations recognised that many routine hazard and near miss reports would be through less formal channels, and union representatives and HSC members were sometimes used because of their accessibility.

As well as simply being a convenient route into the HSC, union representatives can take up cases which people are unwilling to trust to the normal system, and so also offer a truly diverse route for raising concerns or reporting events at high level. The option seemed to be accepted as a valid one and a valuable safeguard by all participants who commented. The importance of union representatives, who might be the only people with the backing needed to confront ‘old culture’ management, was also explicitly mentioned by interviewees on all the sites with union recognition, particularly in larger unionised blue collar organisations where both staff and management tended to see the union as an alternative and effective reporting route. However it would still be a matter of concern if employees felt unable to use the company systems because of a fear of harassment or some other reason.

8.3.4 Diverse Reporting in Smaller Companies

Smaller companies inevitably had more difficulty in arranging for diverse reporting options, but it ought to be possible for even the smallest to find someone willing to be phoned confidentially e.g. a non-executive director or professional advisor.

8 Small companies need SOMEONE independent who visits occasionally, either 2nd director or consultant. [Chief Executive]

8 2 weekly visit by approachable person allows things to be brought up - MUST have boss' backing though. [Chief Executive]

8 There is a notice on the board, telling everyone what the Directors’ and the Authority’s phone numbers are. [The procedure is] ring them if you don’t get satisfaction. [Supervisor]
8.4. RESPONDING TO CONCERNS

8.4.1 Response

The speed with which hazards and faults were cleared was one of the main indicators employees used to assess the commitment of management to a safe working environment. In the employee interviews, the pointlessness of reporting concerns if nothing was going to happen was the most frequently mentioned demotivating factor, whereas prompt attention strongly encouraged reporting. Even more importantly, prompt attention to hazards directly improves safety and reduces SHE risks.

8  Issues will only be raised if people see that things get fixed as a result - soon enough for them to associate the two. [Quality Manager]

On many sites, repairs were the responsibility of the maintenance and general service departments, so the speed and effectiveness of their response is a real SHE issue. So is the professionalism with which their work is done. The workplace should never be left in an unsafe state.

8  It takes SO much effort to get anything fixed, only a few ever bother. Need fast maintenance response. [Employee]

8  HSC can get things fixed, but fast maintenance is the key to safe working and to getting people to report problems in the first place. [Employee]

8.4.2 Feedback

Feedback is vital, to maintain enthusiasm for a scheme, to disseminate the lessons learned and stimulate related reports, and as a quality check on the event report as eventually compiled. Almost all organisations using a form acknowledge receipt of a report by means of a tear off slip or something similar. Fewer make explicit provision for feedback to the originator on the results of the analysis and the action taken, but it is good practice to do so.

Yet our perception is that feedback from schemes within the scope of the survey tended to be unstructured, and may only be sent to the originator. This does not allow for the lessons to be learned more widely on site and across sites. It also fails to take advantage of the powerful effect reports of events and remedial actions have on risk awareness and readiness to report. The mechanisms mentioned by participants which could be used to provide better quality and wider feedback included:

- Newsletters
- 'Toolbox talks'
- Workshops
- Tear-off slip on report form
- HSCs
- Incorporated in training
- Access to data base
A variation of the ‘toolbox talk’, whereby the lessons of incidents are reviewed at work group level is reasonably widespread, more so in environments where there are natural teams. Some organisations have a formal system by which incidents and near misses are reviewed first at team level, and then passed up for review at higher level committees, depending on the significance of the event. The HSC Statutory and less formal safety committees can be a useful forum, and are widely used by participating organisations to provide feedback.

Newsletters, either dedicated to the scheme or newsletters which included discussion of events, were felt by those who used them to be very valuable in spreading the lessons, raising safety awareness generally, and in raising awareness of the scheme.

8 Use the newsletter for feedback on lessons learned from investigations. [Employee]

8.5 REPORTING AND THE REGULATOR

Some interviewees mentioned relationships with national and local regulators in the context of SHE reporting.

One or two reported problems in getting a sufficiently enlightened response to reports. It seemed that regulators sometimes had difficulty responding positively to apparent increases in the number of events and near misses when new initiatives were implemented, even though it reflected better safety management and more complete reporting rather than any real increase.

8 Relationships with the regulator and local government inspectors are very important - they have to be open and fair and built on mutual respect and trust as far as is possible. [Employee]

8 Local authorities treat reported events as an indicator of a problem, we are trying to encourage MORE reports. The regulator has to understand near miss report and reporting issues. [SHE Advisor]

On the other hand, some interviewees criticised regulators for being too slow to intervene. Audits by HSE staff had a huge impact. At least three of the sites visited had attracted detailed HSE attention for one reason or another, and in both cases it provided the impetus for a major overhaul of SHE Management. One or two SHE Managers might have welcomed the support that a HSE inspector might have been able to give them.

8 We blew the whistle. We even made a video of what was going on. But nobody ever followed it up. [SHE Manager]

8 External audit by the HSE was a real driver in keeping standards high / triggering change. Seems to have stopped now though.....[Employee]

If all else fails, the employee has the option of ‘blowing the whistle’ to the regulator or some other external body. Indeed, professional codes of practice may well require it under some circumstances. This alternative was raised in most of the interviews. All recognised the importance of the option under extreme circumstances, and pointed out the HSE contact addresses were on notice boards. Staff could, perhaps, have been more clearly advised of the circumstances under which they are expected to use them.
One or two examples did come up of instances where the interviewee had considered calling in the regulator, but it appeared that matters were sufficiently well resolved before they took that step. One of the participating companies had itself ‘blown the whistle’ concerning another company on a shared site, but had been disappointed by the response.

8 There needs to be a whistle-blowing route, but it would be disappointing if it’s needed. [SHE Advisor]

8 Unions could and would call in HSE if necessary, though they never have. [Employee]
9. SHE TRAINING

- Put in place a formal SHE training matrix, covering induction, safety management and workplace safety and reporting routes for concerns.
- Develop HSC members and supervisors as informed SHE champions
- Pay attention to the development needs of the SHE team, and the SHE awareness needs of the management team.
- Site induction is important, and has to re-orient contractors to the client's expectations and safety management systems.

Many of the comments made during the survey related to SHE training programmes, and for convenience, these have been pulled together in this section of the report.

9.1 APPROACH

Selection, training and appraisal are important to the reporting of hazards and events and to the implementation of subsequent remedial action in two ways.

- Those involved must have the technical knowledge to carry out their roles within the safety management system – from senior management down to site HSC members;
- Training is needed to promote wider SHE awareness, without which there will be little in the way of hazard or event reporting and little effective response.

Effective training requires money, facilities and a willingness to release busy staff. Unless it is seen as a senior management priority, these will not be forthcoming in the face of conflicting pressures. Failing to release staff must therefore be seen as a black mark at appraisal time.

8 Training courses have to be in house, and the room has to be booked a year in advance! [SHE Manager]

8 Training managers are the sort of thing that help safety but are under threat from downsizing. [SHE Advisor]

SHE performance arguably depends as much on the management and communications skills within the organisation as on the specialist skills of the SHE teams. Therefore effort put into management development makes a major contribution to SHE performance and in particular to achieving both good SHE performance and good business performance. Formal training is important, but most of the interviewees also stressed the importance of learning on the job and through participation in projects with more experienced team members. Learning through involvement was sure to have longer lasting effects.

8 Training doesn’t stop with induction. Participating in inspections is a valuable learning opportunity. [Employee]
On many high hazard sites, emergency exercises would be a routine part of the risk management programme. These provide an opportunity for previously unrecognised concerns or difficulties to be identified, providing they are run in a way that encourages and stimulates those involved to think laterally and speak out about difficulties they had encountered in similar situations. An exercise with too much emphasis on demonstrating how good the emergency arrangements are might not offer this opportunity.

9.2 TRAINING FOR SAFE WORKING FOR EMPLOYEES

9.2.1 Site Induction

All site staff normally went through an induction process that includes a safety module. This should definitely include managers and supervisors, and not be limited to shop floor staff. Although some inductions were limited to instructions in case of fire or other hazard, most also included good practices in developing safety culture and promoting reporting of concerns.

Outworkers tend to be ignored in training and reporting schemes. They should not be.

Joint training with contractors was a rarity, though there are obvious benefits if the practical difficulties can be overcome. Company and site induction for contractors needs to be very thorough though, and must ensure that everyone understands the agreement covering the interface between the client’s and contractor’s safety management systems.

8 Contractors are a problem – they MUST have an induction, even if only there for one day, to get across reporting procedures and set out clear expectations. [SHE Manager]

9.2.2 Site SHE Refresher Training

Good practice seems to be to ensure staff attend a one day site SHE refresher workshop at least every two years. The format can be more interactive than the induction course and can include discussion of policy, culture and events as well as updating the induction material. The aim is to improve involvement and commitment, as well as awareness and knowledge.

8 SHE training comprises an introduction, then short, interesting, on-site courses for everyone on safety management principles and on generic hazards e.g. lifting and handling. Then department - specific hazard teach-ins. [Employee]
9.2.3 Workplace Hazards and Skills Training

Site induction and refresher training should be supplemented with additional SHE training targeted on raising awareness of the hazards in the specific workplace, use of PPE and any specific responsibilities during emergencies. Risk assessments provide a convenient framework for the workplace hazard awareness training, and an interactive workshop format allows feedback that may improve the existing assessments. Again, the aim is to improve involvement and commitment as well as awareness. It is important that the training be practical and immediately relevant to the workplace.

8 SHE training is linked to the risk assessment programme and event patterns. [SHE Advisor]

8 I would send people on the course if it were worthwhile, but it's just a run through of the regulations. [Supervisor]

9.2.4 HSC Members and Safety Champions

The amount of training given to HSC members and safety champions varied considerably, from very little to the National Examination Board in Occupational Safety and Health (NEBOSH) plus further specialist training. The appropriate level of training depends on the organisation, but if the HSC is to be fully effective as a proactive group, they do need something more than the rest of the workforce. In particular, a part time SHE manager or one covering multiple sites must have a well-trained network supporting him. Some participating organisations expected all their supervisors to be champions for safety, trained them accordingly and involved them in working groups and SHE seminars. The secondary benefits of such training were mentioned several times. They included:

- Increased confidence
- Team building within the HSC / SHE network
- Recognition for the extra effort HSC / SHE network members put in
- Recognised training helps with promotion, and makes membership attractive.

On sites where it applied, interviewees valued the SHE training provided by unions for their representatives on the HSC, provided that it contributed towards good practice and an open culture and did not seek to promote an outmoded ‘us and them’ approach within the HSC or an imbalanced claims culture.

9.2.5 First Aiders

The training of first aiders is generally outside the scope of this survey. In the company context, first aiders ought to be made aware of the need to encourage people to report accidents and near misses fully and accurately, and to use their experience to look for any patterns of injury and unsafe conditions or behaviour.

8 First aid training is good; we get volunteers because we emphasise the benefits outside work e.g. to help family. [Chief Executive]

9.2.6 Comments from Smaller Companies

Smaller companies obviously have more difficulties in releasing staff for training, but it would seem important that at least one member of the company has a good overview of SHE issues, typically to NEBOSH level.
9.3 SAFETY MANAGEMENT TRAINING

9.3.1 Senior Management Awareness

It was not common for senior management to have received specific SHE awareness training, though SHE managers in particular seemed to feel that SHE performance would benefit greatly if they did. Where senior management received safety awareness training, the objectives included helping participants focus on the strategic issues rather than the operational detail, leadership, communication, culture and regulatory developments. Conventional training seemed less successful than intensive workshop sessions at this level. Approaches mentioned included workshops based around simulations of strategic SHE management and allocation of resources and presentations from high profile, challenging academics.

9.3.2 Safety Management Training

Supervisors and first line managers ought already to have received the workplace hazards and skills training relevant to areas for which they have responsibility. However these are the critical grades of staff when it comes to promoting workplace SHE culture, encouraging reporting, investigating events and implementing remedial measures. They therefore typically need to attend a higher level course to help them appreciate the principles and practice of first line safety management. The training ought also to help them understand how to evaluate the effectiveness of the SHE management system in their own area of responsibility. Senior management would normally attend at least part of the programme, to get across the importance they personally place on good SHE management and performance and to emphasise the need for constructive intolerance on SHE issues. Supervisors and managers need to feel that they have the backing of senior management if they have to stop production, for instance, because of a SHE risk.

8 It’s easier to train managers, because no one notices if they are away for a day - unlike production! [SHE Manager]

9.3.3 The SHE Team

Although the site SHE Managers surveyed were all heavily involved in training others, the picture was much patchier when it came to their own development. Interviewees clearly found it difficult to find time to keep up to date with journals and legislation.

One or two SHE Managers felt they were doing the job on the basis of past experience, but that lack of continuing personal development meant that their value to the organisation was steadily reducing and they were less able to act as ‘head of profession’ for the other professionals. A SHE manager who is not up to date is less able to advise on new regulations and hazards, and will be unfamiliar with new approaches to SHE management and information sources. SHE Managers and Advisors should have a structural development programme. Hazards Advisors need safety management training, but also need to be encouraged and enabled to keep up to date in their special area of expertise.

8 Training for the SHE Manager? No time! [SHE Manager]

8 [Our] hazard specialists are leaving, and the replacements have much less expertise. [Employee]
APPENDIX A – PARTICIPATING ORGANISATIONS

We gratefully acknowledge the support of the participating organisations and the contributions of the many individuals who gave so generously of their time. All these organisations were asked whether they would like to be identified. Those that replied in the affirmative are listed below:

Alcan
Atlantic Power
Autumn House
Avanti
B&Q
Bank of England
Birse Construction
Blue Circle
BPC
Esso
Forte
Magnox Electric
S&N Research
Sifbronze
Speedo
APPENDIX B – SUMMARY OF GOOD PRACTICES

**CULTURE**

- Corporate culture is the major determinant of safety. A good SHE culture requires genuine commitment and active, visible leadership from senior management.
- An open, empowered culture that promotes 'constructive intolerance' of risk is the objective. Fairness and 'enlightened response' is necessary. 'No blame' policies are rarely appropriate.
- Sufficient resources must be allocated to SHE management, and to the functions such as maintenance, which keep the working environment safe and respond to concerns.
- Empowerment does not do away with the need for supervision. High calibre, conscientious and safety aware supervisors are essential.
- Look for sustainable, continuous improvement. Do not expect quick fixes from initiatives that fail to address the real drivers of culture within the organisation. Support people through the change process.

**ORGANISATION & MANAGEMENT**

- Appoint a corporate SHE Advisor, skilled in culture change and SHE management, to coach and monitor senior company management and monitor site SHE performance.
- Set up SHE policy teams of senior managers at corporate and site level, to review performance and strategy, and to ensure site management are held to account.
- Set out clear corporate expectations of SHE performance and the general approach to be used, but leave the detail to the sites.
- Use indicators to monitor performance and benchmarks, but be wary of links to bonuses.
- Integrate SHE targets into business plans and individual action plans.

**OPERATIONAL SITES**

- Site SHE Managers are key individuals. They should be able to advise with authority and competence and be able to persuade all parties to get behind and allocate resources to proactive safety programmes whilst still being willing to challenge unsafe behaviour at any level.
- OSH Advisors and volunteer hazards advisors have a valuable part to play in the SHE team.
- Good site HSCs are working parties, not confrontational talking shops. A co-operative HSC can develop and drive forward improvements and culture change. Involve as many people as possible in SHE initiatives and improvement project teams.
- Prepare regular site SHE reports.
- Maintain a database that supports trending and root cause analysis.
- Don't ignore the hazards of the car park and shared facilities.
RISK AWARENESS & AUDITING

- Risk awareness underpins SHE management. Institute a structured programme that will produce an enduring impact by involving as many people as possible.
- Line managers should be accountable for the completion of risk assessments, but they should be carried out by the supervisors and their teams, with the SHE team providing specialist support.
- Auditing is important for reasons that go well beyond checking compliance and seeking out hazards. They stimulate reporting and raise awareness.
- Effective routine maintenance programmes and quick response to faults, breakdowns and concerns are just as important to SHE performance as SHE management systems – invest in them.

HAZARD & EVENT REPORTING

- Reporting schemes must be simple to use and provide diverse routes for raising concerns.
- Near miss and hazard reporting is essential, but effective screening and prioritisation is needed.
- Local teams can take responsibility for identifying, assessing and responding to concerns in most situations.
- There must be a confidential option for reporting concerns, although open reporting should be the objective. Anonymity should not be encouraged.
- Fast and effective response to reports of hazards is a powerful motivation for improved reporting, and makes the workplace safer more quickly. Fast maintenance was frequently mentioned as one of the keys to safe working.
- Attention needs to be paid to keeping awareness of reporting schemes high, to providing quick feedback to originators, and to disseminating the lessons from events.

SHE TRAINING

- Put in place a formal SHE training matrix, covering induction, safety management and workplace safety and reporting routes for concerns.
- Develop HSC members and supervisors as informed SHE champions
- Pay attention to the development needs of the SHE team, and the SHE awareness needs of the management team.
- Site induction is important, and has to re-orient contractors to the client’s expectations and safety management systems.
APPENDIX C - ACRONYMS

CIA  Chemical Industries Association
GP  General Practitioner
HQ  Headquarters
HSC  Health and Safety Committee
L&H  Lifting and Handling
LTA  Lost Time Accident
MD  Managing Director
NMR  Near Miss Report
OSH  Occupational Safety & Health
PCAW  Public Concern at Work
PPE  Personal Protective Equipment
QA  Quality Assurance
RA  Risk Assessment
SA  Safety Advisor
SHE  Safety Health and Environment
SMS  Safety Management System
TQM  Total Quality Management
WP  Working Party
Safety Cultures:
Giving Staff a Clear Role

PART III: REPORT ON FIVE FOCUS GROUPS

Health and Safety Cultures in Organisations
Qualitative Research Findings

A Report By Sarah Webster & Gill Howard
For Public Concern At Work
And The Health and Safety Executive
## CONTENTS

<table>
<thead>
<tr>
<th>Section</th>
<th>Page No</th>
</tr>
</thead>
<tbody>
<tr>
<td>Background and Research Objectives</td>
<td>i</td>
</tr>
<tr>
<td>Methodology and Sample</td>
<td>ii</td>
</tr>
<tr>
<td>Summary of Findings</td>
<td>iv</td>
</tr>
</tbody>
</table>

## MAIN FINDINGS

<table>
<thead>
<tr>
<th>Title</th>
<th>Page</th>
</tr>
</thead>
<tbody>
<tr>
<td>The Perceived Importance of Health and Safety Issues at Work</td>
<td>1</td>
</tr>
<tr>
<td>Promotion of Health and Safety Issues</td>
<td>6</td>
</tr>
<tr>
<td>White Collar Workers' Perceptions of Health and Safety Responsibilities and Risk Management in the Work Place</td>
<td>8</td>
</tr>
<tr>
<td>Blue Collar Workers' Perceptions of Health and Safety Responsibilities and Risk Management in the Work Place</td>
<td>12</td>
</tr>
<tr>
<td>The Management Perspective on Risk</td>
<td>16</td>
</tr>
<tr>
<td>Problems Encountered Implementing Good Health and Safety Practice in the Work Place</td>
<td>20</td>
</tr>
<tr>
<td>The Reporting and Handling of Employee Concerns</td>
<td>24</td>
</tr>
<tr>
<td>Attitudes to Public Concern at Work</td>
<td>33</td>
</tr>
<tr>
<td>Conditions and Practices Perceived to Promote Health and Safety</td>
<td>35</td>
</tr>
</tbody>
</table>

## APPENDICES
BACKGROUND AND RESEARCH OBJECTIVES

Background

In 1996 Public Concern at Work conducted a postal survey among Health and Safety Managers on the relative importance of employee concerns about health and safety risks and the practical and cultural issues associated with this role.

The survey was successful in identifying a number of key themes. However since the survey was restricted to the views and experiences of health and safety managers and the sample was limited to those who chose to return the questionnaire (42% of the sample), Public Concern at Work decided to commission further, qualitative, research to:

i) establish the extent to which the survey respondents’ views and experiences are shared across their organisations

ii) explore the awareness, attitudes and behaviour of independently recruited managers and staff, to counter any possible self-selection bias that may exist among survey respondents

This report covers the second, independent, sample component only.

Research Objectives

The objectives of the qualitative research among the independently recruited sample of employees were as follows:

i) To establish awareness and perceptions of health and safety issues in the workplace

ii) To understand the relative importance of and practical issues relating to health and safety at work

iii) To ascertain the role that employees can and do play in reporting risks

iv) To identify the main barriers that employees face in reporting concerns about health and safety and how such barriers can be most effectively addressed

v) To explore attitudes towards the provision of guarantees of confidentiality and/or anonymity in the context of procedures for reporting health and safety concerns

vi) The effect of organisational size on each of the above objectives
METHODOLOGY AND SAMPLE

Methodology

Five group discussions were conducted. Each group discussion comprised 8-9 respondents and was an hour and a half in duration.

Respondents were recruited independently and were told before attending that the discussion would concern ‘being an employee/manager in the 1990s’. In this way we hoped to prevent any health and safety bias in the sample.

The discussions were conducted on the 8th, 10th and 11th December, 1997 in Chorleywood, Hertfordshire and Birmingham.

Sample Specification

The sample comprised a broad range of occupations, industry sectors, organisational sizes and levels of seniority.

The five groups were structured as follows:

<table>
<thead>
<tr>
<th>Group</th>
<th>Status</th>
<th>SEG</th>
<th>Age</th>
<th>Area</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>Lower ranking blue collar</td>
<td>C2D</td>
<td>20-40</td>
<td>Midlands</td>
</tr>
<tr>
<td>2</td>
<td>Lower ranking white collar</td>
<td>C1C2</td>
<td>20-40</td>
<td>South</td>
</tr>
<tr>
<td>3</td>
<td>Middle ranking blue collar/on site</td>
<td>BC1C2</td>
<td>30-50</td>
<td>South</td>
</tr>
<tr>
<td>4</td>
<td>Middle ranking white collar</td>
<td>BC1</td>
<td>30-50</td>
<td>Midlands</td>
</tr>
<tr>
<td>5</td>
<td>Senior Managers, Directors, Chief Executives</td>
<td>AB</td>
<td>N/A</td>
<td>South</td>
</tr>
</tbody>
</table>

Additional Criteria

Groups 1 and 2 - to identify themselves as having a relatively junior/non managerial position in the company, mixed sex

Groups 3 and 4 - to identify themselves as having a middle management/responsible supervisory role in the company
Group 5 to comprise:

- minimum 2 MD's/Chief Executives from small businesses (10-50 employees)

- minimum 2 in senior positions at middle sized organisations (50 - 1,000 employees)
  - second or third in company hierarchy
  - at least responsible for a department
  - budget holder

- minimum 2 in senior positions in large organisations (1,000+ employees)
  - directly responsible for at least 20 employees
  - responsible for a budget of £250,000+

- a range of functions represented

- a mix of sectors to be represented including public sector, private service industries and manufacturing

A more detailed breakdown of the actual sample composition is provided in Appendix 1.
SUMMARY OF FINDINGS

1. The vast majority of respondents in the sample considered health and safety in the workplace to be a salient issue within their organisation and relevant to themselves.

2. Emphasis on health and safety was felt to have increased in recent years. This was attributed to a number of factors but especially EC Directives and the law on personal liability. Corporate image within a society that now expects employers to be highly conscientious was also seen to be a major influence on larger commercial organisations.

3. Whilst the overall aim of health and safety regulations was unanimously endorsed, and they were felt to have had a beneficial effect on working conditions, the quantity of information that an employer is expected to deal with was felt to be highly impractical - especially for the smaller organisations who cannot afford to have a dedicated health and safety officer. Most managers admitted to being unable to keep abreast of all aspects of the law and felt that important points can become lost in a plethora of minutiae.

4. There was a noticeable difference in the study between the awareness, attitudes and experiences of those in large, well known organisations and those employed by smaller companies. This was apparent in both the white and blue collar sectors but was particularly striking among white collar workers.

Whilst those in larger companies considered themselves to be well prepared for the risks they face and to work in an environment where risk is well managed, many of those in smaller organisations felt that health and safety diligence was not always as it should be. Blue collar workers claimed management did not always address potential hazards until after an accident has occurred, despite concerns being raised before hand. White collar workers in smaller organisations felt that health and safety was given only lip-service unless an inspection was imminent. Lack of resources was thought to be the primary cause of smaller companies’ short-comings. The health and safety officer has other responsibilities which frequently take precedence and finance may not be available to improve conditions and practices.

An exception to this pattern emerged from some of those respondents employed in the public sector. Whilst they felt health and safety to be given due emphasis through thorough training and good practice, an inability to finance major capital improvements can result in the continuance of a situation that is blatantly unsatisfactory.

5. Most acknowledged that even when resources are available it can be difficult to ensure that practice is always followed. Engrained behaviour among older workers, work place culture, conflicting pressures and basic human error all make it very difficult for management to ensure optimum safety.

6. As part of the culture of individual responsibility that appeared to be present in many of the organisations represented in the sample, employees were usually felt to be an intrinsic part of risk identification. Most managers claimed actively to encourage staff to voice their concerns and to have in place formal reporting procedures for doing so. Smaller companies tended to operate a more ad-hoc open door policy.
In the blue collar sector, union representatives were often seen to play a useful role in communicating employee concerns to management. Frequently, union officials were felt to be informed, pro-active personnel who can help management keep up to date on regulations, identify hazards, advise on how they should best be addressed and have the necessary clout with senior management to ensure requests to fund the improvements are successful.

7. The research showed that employees who wish to report a concern faced two main obstacles, both largely cultural.

Lower level staff worry about peer group rejection. This is particularly the case in the blue collar sectors where peer group bonding and a 'them and us' culture still pervades many larger companies. But concern about working relationships was very evident among the white collar workers too.

Fear of being ostracised by one's work colleagues for reporting a health and safety concern to management is greatest when that concern relates to the behaviour of another member of the group. Reporting a concern about unsafe machinery or conditions was usually not felt to be a sign of disloyalty.

However, newer staff did not wish to be treated with disdain by more seasoned colleagues for 'whinging' about aspects of their job that were generally accepted. Consequently if peer group backing for an individual's concern is not forthcoming, it may not be reported.

Another barrier to reporting health and safety concerns, affecting both lower level workers and middle management, is the fear of being seen as a pain or, even, a trouble maker by one's seniors and of this affecting one's prospects. Even some of the senior managers in our sample agreed that overly conscientious people can become labelled.

8. Assurances of confidentiality, together with the opportunity to report outside the line to a neutral third party with influence, e.g. an effective Health and Safety Officer, were felt to help allay some of these fears.

It was however felt that anonymity should be discouraged as it may result in genuine concerns being under-investigated for reasons of either insufficient information or lack of credibility.

9. The key to everything was felt to be the culture of an organisation. An open, co-operative culture with good two-way communication, as experienced by some of the respondents working in large, modern white collar organisations and small, often family run, manufacturing companies, can result in genuine feelings of mutual respect and responsibility - seen as vital to the implementation of good health and safety practice.
1. THE PERCEIVED IMPORTANCE OF HEALTH AND SAFETY ISSUES AT WORK

1.1 Overview

The majority of respondents in all groups felt that health and safety is a very important issue which is treated with due emphasis at their workplace. Whilst most obviously relevant to those involved with manufacturing, construction and other ‘manual’ occupations, office based staff also perceived health and safety to be pertinent to themselves.

"Everywhere has its own needs. In offices there are a lot of hidden dangers that you don’t realise, that you get used to, like being at home."

Lower level, white collar

1.2 Reasons for Increased Salience

There was a general consensus that considerably more emphasis is placed on health and safety in the workplace now than was the case a few years ago. This was attributed to the cumulative effect of EC directives, changes in the law including that relating to personal liability, increased regulation via quality assurance schemes, the demands of insurance companies in an evermore litigious climate and the increased expectation that organisations should be socially responsible. These are discussed below.

Increased Regulation -

All agreed that their working environment is more highly regulated now than it has ever been in the past. EC directives and the associated legislation, policed by a largely effective Health and Safety Executive have resulted in numerous changes in working practices and conditions in many organisations.

"Everything is highly regulated. You have to do things by the book now..."

Middle level, blue collar

Insurance Company Demands -

As a condition of providing corporate cover against employees’ health and safety related claims, insurance companies insist that an organisation should undertake a wide range of preventative measures which must be fully documented. These measures often go beyond government regulations and are frequently seen to be necessary only as a legal, back-covering exercise.

"We have to sign these forms saying we have read the regulations and are responsible for any injury to ourselves brought about by our own fault."

Lower level, blue collar
Some seems fairly unfortunate...like you have to put in writing and sign it to say you have taught someone to use a step ladder with 3 rungs on it...but believe you me if you haven't and they fall off it they have you for it... that part of it is very tedious, very boring, unfair and unfortunately it has to be done now. That is more to do with the insurance aspect than anything else because people are out for what they can get now...”

Senior Managers, small-med.co

Personal Liability -

Employee's recognition of personal responsibility for the safety not only of themselves, but their colleagues and their customers also, was felt to be much greater these days. In part this was thought to be the result of better training and more open, co-operative, corporate cultures. It was generally agreed, however, that a major influence for most has been the knowledge that they can now be held personally liable for any accident or damage to health that may occur as a result of their deemed negligence, however unwitting or unfair it may seem.

"You've got to cover yourself against personal injury claims."

Middle level, blue collar

"We had a D and B test recently. It fell within the legal limits but I was advised to have earguards for the staff...because if someone had problems later on in life they could actually sue me as an individual. So now they are there to use if they want."

Middle level, blue collar

Quality Assurance Schemes -

Quality Assurance Schemes such as ISO9000, Investors in People and BS5750 were frequently cited by those involved to have resulted in an increased emphasis on health and safety through improved training, regular assessments and more stringent monitoring.

"We used to not think about risk, but now you realise...you have to be tested on it as part of ISO9000."

Lower level, white collar

"Quality assurance has made it more rigorous. It's got people to do the paperwork side and it's made people realise that if they don't do it they won't get any more jobs."

Middle level, blue collar

There was, however, doubt among some of the managers as to whether such exercises are always worthwhile. In some instances their detail was felt to be little more than a time consuming paper exercise.
“Once a year we do a risk assessment on each premises and outline the various steps, actions that should be taken... it’s something we’ve introduced in the past year, being more aware of legislation and the need to have a policy that’s not just there but is actively promoted and brought up to date. But having said that, it’s taken a lot of people’s time to do what so far has just been a paper exercise... but on the other hand we haven’t had any accidents so you could say it’s been a preventative thing. It’s hard to say.”

Senior Managers, small-med co

Demand for Corporate Responsibility

Employees and the public at large were felt to be better informed these days on health and safety issues. The media give it more attention. Organisations are expected to provide a safe environment for both staff and customers and to have a responsibility to the public at large should they be in any way affected. Consequently it was generally agreed that any organisation which cares about its public image must be seen to be scrupulous on health and safety matters.

“Employees are more aware these days on all employment issues.”

Senior Managers, med-large co

“Big companies are concerned about their image. They can’t afford to look bad.”

Lower level, white collar

“The bigger they are, the more well known they are, they have to follow up on their safety procedures.”

Middle level, blue collar

1.3 Safe But Not Necessarily Healthy

White collar workers at both the lower and middle management level agreed that whilst they felt their companies were ensuring they worked in an environment that was as physically safe as possible, the less tangible effects on their long term health was often disregarded. In their view issues such as long working hours, stress and an unpleasant air-conditioned atmosphere should also be addressed.

“Safety is ok. It’s the health - the work environment that’s the problem. We’ve got air conditioning and can’t open any windows. It’s always too hot or too cold. We’ve all got colds.”

Lower level, white collar
“It’s health. They expect us to work very late. Like until 2am sometimes. Surely someone must do something. If you say ‘no’ you’ll end up losing your job. But it could have health implications.”

Lower level, white collar

“If someone noticed a trailing wire, they’d soon get it shifted. But the fact that we’re sat there 5 days a week with these awful fluorescent lights and VDU’s damaging our eyes... if it’s not an accident they don’t do anything.”

Middle level, white collar

Effect of Organisational Size -

It was evident in both the blue and white collar groups that employees of larger, well known organisations and those in the public sector, tended to have a higher level of health and safety awareness and appeared to enjoy a work environment where risk was better managed than those who worked in smaller organisations. (The exception to this were the small, often family run, manufacturing concerns where there was a high level of potential risk and the management were felt to be genuinely concerned about their workforce).

The disparity between large and small organisations was attributed to two primary factors: public image and, most particularly, finance.

“It depends on how big the company is and the finance available.”

Middle level, white collar

Public image has been discussed above. Finance was felt to be the key to good health and safety standards. It was felt that larger companies can usually afford to offer staff better conditions through:

- owning modern, purpose built premises
- being able to offer staff extra health facilities (eg. Occupational Health Department, special seats for bad backs)
- having a dedicated health and safety officer(s)
- enjoying a larger training budget per head
- being better able to finance repairs/improvements

These issues are discussed in detail in section 9.
1.5 Is The Balance Right?

The increased emphasis on health and safety in the workplace was broadly welcomed at all levels.

"It’s a change for the better. We have more responsibilities but we have more rights too."

Middle level, blue collar

"There’s much more emphasis on it. It’s right and proper. People should expect to work in a safe environment."

Middle level, blue collar

However, a number of middle and senior managers expressed frustration at the amount of extra work some requirements generated. Indeed, there was a feeling among many of the middle and senior managers that whilst the overall purpose of the directives and regulations was laudable, the detail can seem ridiculous.

"What I find excruciating about it is that it doesn’t matter if it is something life threatening or the most ridiculous thing like using a step ladder, the legislation seems to treat everything with the same broad brush..."

Senior Managers, small-med co

"The balance has gone too far. There’s too much detail. Ludicrous things like people lifting up bits of paper to put in photocopiers - you have to do a risk assessment, that’s silly."

Senior Managers, med-large co

Most felt that the amount of health and safety information they are expected to deal with is entirely impractical and could even have a detrimental effect on communication, the important points being lost in the detail.

"It’s definitely brought down the death rate and the injury rate in the construction industry....in principal it’s very good but you get bogged down in the paperwork."

Middle level, blue collar

"We do get bombarded with too much information. The important things are just lost in the detail....there’s too much to learn but you have to sign to say you have."

Middle level, blue collar
2. PROMOTION OF HEALTH AND SAFETY ISSUES

2.1 Overview

A broad spectrum of experiences was represented in the groups. All were aware of some form of health and safety communication, but experiences varied from only a battered leaflet on the noticeboard at one end, to rigorous training courses, with tests, and updates at the other.

2.2 Means of Promotion

For most, health and safety awareness and good practice was promoted via a multiplicity of means including:

- general induction course and/or manual to read and sign
- job specific training
- occasional fire drill
- posters
- leaflets on noticeboards (rarely read)
- correction exercise in advance of HSE visit
- occasional memos (white collar)
- staff meetings (white collar)

"We have a folder to read through. We have to sign for it and are tested on it."

Lower level, white collar

"The Health and Safety Executive do some really good posters. They're simple, clear and fun. They brighten up corridors."

Senior Managers, med-large co

A minority, mainly those in the public sector or in large 'blue collar' organisations, were subject to more rigorous safety promotion via clearly specified working procedures, refresher courses, promotional videos, team meetings and internal health and safety policing.

"We are trained on everything....even making cups of tea."

Lower level, blue collar

"Within the Local Authority everyone has to go on a health and safety course to make them aware."

Middle level, blue collar

"They come round every now and again and tell us what we should be doing."

Lower level, blue collar
In contrast, some of those working in small organisations claimed to receive little, if any, formal health and safety training. Relevant issues were communicated informally as part of the on-the-job training and were seen to be basic common sense.

“All we have are a few dog-eared posters around the place that have been there for years - nobody really notices them.”

Lower level, blue collar
3. WHITE COLLAR WORKERS’ PERCEPTIONS OF HEALTH AND SAFETY RESPONSIBILITIES AND RISK MANAGEMENT IN THE WORKPLACE

3.1 Perceptions of Risk in the Workplace

Almost all the white collar workers in the sample recognised that health and safety issues are pertinent in the office. Electrical equipment was felt to be the main area of potential hazard, although risks such as filing cabinet draws being left open were also frequently cited. Those whose job involved interface with members of the public were aware of risks both to customers from their premises and from customers to themselves.

"Chairs blocking aisles, filing cabinet doors left open, the condition of the furniture..."
Lower level, white collar

"You need to look at trailing wires and checking the Christmas decorations aren’t too close to the lights."
Middle level, white collar

"We need to be aware of the risk to customers. Tripping over mats, trapping their fingers in doors and so on."
Middle level, white collar

"There’s always the risk of robbery or of someone getting violent."
Middle level, white collar

Invisible risks to long term health also concerned a number of respondents.
(See section 1.3)

A minority were more sanguine and felt that, in comparison with manual work, there is little danger in the office environment.

"It seemed more relevant to me when I was a gardener, I was working with tools and chemicals...I don’t feel I’m at much risk now."
Lower level, white collar

"There aren’t any real safety risks...the worst thing we get is a paper cut."
Middle level, white collar

3.2 Recognition of Responsibilities

The vast majority of respondents worked in organisations where the corporate culture encouraged all employees, at whichever level, to feel responsibility for the safety of themselves, their immediate colleagues and anyone who may be in their building - be it other staff or customers. Some also spontaneously mentioned a responsibility towards the public at large, either in terms of their product or through the environment.

"We’re all responsible for safety. If we see something we do something about it."
Lower level, white collar
This attitude was perceived as the modern day norm for medium-to-large organisations. In such a climate, employees feel actively encouraged to report any health and safety concerns they may have, they see it as the right thing to do for all concerned, and are confident that any matters raised will be taken seriously and acted upon. (See section 7)

"It’s what you would expect these days."

Lower level, white collar

Such a culture appeared to be less prevalent in the smaller organisations represented in the sample, where a laissez faire approach seemed to be usual unless something is obviously dangerous.

3.3 Risk Management in Larger Organisations

Health and safety awareness, rights and responsibilities are usually included in the initial induction training. Once on the job, set rules and procedures are in place to manage risk. These cover all aspects of office life - from getting someone in to change a light bulb and regular breaks for VDU operators, to regular checks of all electrical equipment and building security.

"We’re not allowed to change a light bulb or a plug - we’ve got to get the right person in."

Lower level, white collar

"I work for an American company and they’re very hot on it to an incredible degree. You can’t use mobile phones, you can’t smoke, you can’t cough without having to sign a form."

Middle level, white collar

Clear procedures exist for reporting health and safety concerns (discussed in section 7) and any accidents that occur are investigated and preventative actions taken if possible.

"Someone opened a window and the whole pane of glass fell into the car park. Since then they’ve set about replacing all the windows - they’re very good like that."

Middle level, white collar

Individuals are, however, resistant to too much control. Procedures are not always followed to the letter especially when they are felt to be overly pedantic and to be unnecessarily obstructive. "Near misses" may not always be reported. Such deviations are not thought to be serious.

"Officially we’re supposed to ask Maintenance to do any lifting, but it’s much easier just to do it yourself."

Middle level, white collar
"The drawer of this filing cabinet was pulled out too far. It fell over and nearly crushed somebody. We just rescued her by holding it up, breathed a sigh of relief and carried on with what we were doing... I suppose we should have reported it, we should have done some kind of notice."

Middle level, white collar

Because they work in what they perceive to be a well managed environment, the employees did not feel they faced much risk. Senior management concurred with this view.

"I don't feel at risk. You are only at risk if things are done wrong. As long as they are done correctly everything is ok."

Lower level, white collar

3.4 Risk Management in Smaller Organisations

At the other end of the spectrum however, those employed by small-to-medium sized companies that are not in the public eye were not at all confident about the safety of their environment. Most claimed that little training is given. The implementation of health and safety regulations was felt to be lax unless an inspection was expected and complaints rarely achieved a result.

"At my new job people don't care. They just sort things out for the inspector."

Lower level, white collar

"It's a quick check once a year to get the certificate. I don't think they'd take any notice of a genuine problem - like if your chair was falling apart."

Middle level, white collar

An ineffectual health and safety officer combined with lack of finance were felt to be primarily responsible.

"It's just another title they've got...they don't know much or do much...someone has to be appointed to pass the company."

Middle level, white collar

"The company used to be really good on health and safety - the old Personnel Manager was very good. But he was made redundant and the new one doesn't care two hoots."

Lower level, white collar

"Tiles keep falling off our false ceiling. I've told the estate manager but nothing's been done. I've been assured it's in next year's budget."

Lower level, white collar

"It comes down to profitability. It's not an excuse but they can't justify sending someone on a health and safety course."

Senior Managers
Since their working conditions were not felt to be actually dangerous, the staff simply learnt to live with their environment by taking extra care and taking action themselves where necessary.

"If I can fix it I will. I do complain to Personnel but nothing happens...there was a trailing cable and people kept falling over it...in the end I just went and unplugged it."

Lower level, white collar
4. BLUE COLLAR WORKERS' PERCEPTIONS OF HEALTH AND SAFETY RESPONSIBILITIES AND RISK MANAGEMENT IN THE WORKPLACE

4.1 Perceptions of Risk in the Workplace

These respondents considered Health and Safety issues to be particularly pertinent to themselves and those in similar occupations. The risk of major accidents from machinery, electricity, hazardous substances etc is clearly apparent and consequently must be well managed.

"There's risk in virtually everything I do...the list is endless."
Lower level, blue collar

"We work with it all the time. One of the major problems we have is bonnets dropping on people."
Lower level, blue collar

4.2 Recognition of Responsibilities

All claimed to take the view that they are responsible for their own safety and that of the people around them.

"Any dangerous situations should be reported and corrected. That's everyone's responsibility. Not just the person who's supervising."
Middle level, blue collar

Even the lower level workers were aware that they could be held accountable for an accident caused by a problem that they may be aware of but were not directly responsible for.

"If we notice something and don't report it, and something happens, then we get the blame."
Lower level, blue collar

Indeed, there was a wide feeling among lower level workers that management are particularly keen to shift responsibility onto individual operatives, probably for fear of compensation claims.

"The comeback is always on us. They say 'you know about it, you should have been using it properly. It's your own fault'."
Lower level, blue collar

From the discussions however it emerged that, in several of the organisations represented in the sample, group bonding is an important part of the culture and in reality, tends to be the main focus of shared responsibility for shop floor workers.

"It's you and your mates. You look out for each other."
Lower level, blue collar
4.3 Risk Management in Large Blue Collar Organisations

The majority felt well prepared for the risks they were exposed to and felt their environment to be by and large well managed.

"It's not that bad, not a lot happens."

Lower level, blue collar

This was seen to be the result of:

- thorough training
- strict procedures and rules for dealing with major risks
- use/availability of protective clothing and equipment
- regular monitoring by health and safety officers et al
- close peer group bonding (see section 4.2 above)
- own common sense
- strong union presence

"We have to follow very strict guidelines."

Lower level, blue collar

"We seem to spend a lot of time either being trained or training someone else."

Middle level, blue collar

"There are procedures for everything."

Lower level, blue collar

"I go on courses all the time. I went on a scaffolding course recently so I can check that scaffolding is up properly."

Middle level, blue collar

"Every contractor now has to provide us with a Health and Safety Policy and method statements for how they intend carrying out the work. It's a lot more intense than it used to be."

Middle level, blue collar

"The Building Director turns up on spec and checks everyone's tools."

Middle level, blue collar

Health and Safety Regulations together with union insistence on preventative measures were thought to be important contributory factors to their well managed risk environment. There was also a view that it may be attributed to management's fear of financial liability in event of an accident, and loss of production time rather than to genuine concern. Some companies' insistence on disclaimer forms and a seemingly callous attitude by supervisors after an incident served to confirm this belief.

"It's the money they're worried about. What they'd have to pay out."

Lower level, blue collar
“What the hell if a bloke’s just lost a couple of fingers - Rolls Royce still want their driving gears...we’ve got to get this job out at this time on this day.”

Lower level, blue collar

“Someone had a heart attack on the assembly track...the gaffer was going ‘we’ve lost twenty grand in two minutes’...they couldn’t wait to get the key in and get the track moving again.”

Lower level, blue collar

Just as all rules and procedures were not abided by in the white collar sector, some respondents admitted that protective clothing, although issued, was not always worn and safeguards on machinery were not always used, if they were felt to make the job more difficult and/or uncomfortable. Peer group norms can make this behaviour acceptable. In other cases it is seen as individual choice.

“We’re given these face masks to wear but most of us don’t. They’re hot and you can’t talk to each other in them.”

Lower level, blue collar

“You’re supposed to work on the machines with a full face guard, but they’re awkward to use and this guy didn’t bother to put his on. His foreman was stood 10 yds away and said nothing. The machine jumped up and took half his face away.”

Lower level, blue collar

Even after a serious accident, people may start to use protective equipment for a short while and then slip back to their old ways again.

“Everyone soon forgets again.”

Lower level, blue collar

A few respondents claimed that temporary staff were responsible for many of the accidents that do occur. They attributed this to insufficient training.

“People lose limbs because they haven’t been trained properly.”

Lower level, blue collar

4.4 Risk Management in Small Blue Collar Organisations

Those who worked for smaller companies tended to be less confident about their environment. They often claimed that management took a more reactive stance, not introducing safety measures until after an accident has occurred, often despite concerns being expressed beforehand.

“They tend to wait for something to happen. Then they start spouting health and safety. But if you bring the issue forward first, then they don’t want to know...or it’s ‘maybe we’ll look at it in a couple of years’.”

Lower level, blue collar
However some smaller, often family run, companies with an established workforce appear to enjoy a better management-worker relationship. Managers were felt genuinely to care about the safety of employees and to work with them in identifying and managing hazards.

"Most of us have been there a long time. They know us. They've been there. No one wants an accident to happen."

Lower level, blue collar

Most striking however, was the difference between the practices in large construction companies and those in some small sub-contractor operations. Whilst the former were considered to be very well controlled through method statements and tight policing by construction directors, site managers, health and safety officers et al, many small subcontractors were believed to pay little heed to health and safety regulations - either in terms of worker safety or disposal of hazardous waste. A manager on such a site believed the HSE tended to focus their attention on large and medium-sized operations and to allow many abuses of health and safety regulations to go unchecked on the fringe.

"The regulations apply to everyone but the eyes aren't on the small jobs. Small companies don't know. You don't get taught. I know some people with so called Health and Safety responsibilities who have never been on a course in their life....It's all right for big companies where things are done by the book. But for small operations it's all down to cost. They cut corners all over the place. No one pays much heed to health and safety regulations in our environment unless it's basic common sense...I can tell them to do something but when my back is turned they're back doing it the old way."

Middle level, blue collar

At the other end of the blue collar sector, the 'soft end', awareness of Health and Safety issues and the management of risk tended to be given less emphasis. Good practice may be in operation but employees are not necessarily aware of its importance.

"I don't know that much about it. We put things in the steriliser...we panic if we know the inspector is coming round...we rush around and try to get everything right."

Middle level, blue collar

"We know we have to do things. It's all down to keeping things tidy and clean - sweeping up the hair, putting the equipment in the steriliser - no one ever comes round. It's all down to us really. We just want to work in a clean environment."

Lower level, blue collar
5. THE MANAGEMENT PERSPECTIVE ON RISK

5.1 Overview

The middle and senior management in our sample were aware of their obligations to both employees and the public. Several had a formal duty to monitor the health and safety practices of their workforce and to ensure everything is done 'by the book'.

"In any senior role where people are responsible to you it affects you - either for insurance purposes or if you are visited by the inspectors..."

Senior Managers

"I deal with it every day. Making sure everyone's got personal protection, doing risk assessments. There's a lot of paperwork...you have to make sure everything is safe....it can cause a lot of problems."

Middle level, blue collar

Whilst acknowledging the importance of this role, it was often felt to be a highly problematic, time consuming area in terms of keeping up with legislation/European Directives, identifying risks, enforcing safe practice and financing safety improvements.

"Having to comply with European Directives...it's hassle and boring. Just tedious. It's got to be done, it's really important, but..."

Senior Managers, med-large co

"The other side of it is making sure the people who work for me actually adhere to it. Now we are much more rigorous in the field, for obvious reasons, but it is mind numbingly tedious to get people to wear their hats, their goggles, to set up their ladders properly...the same in the office environment, to make sure doors are shut and so on. It's boring and tedious to teach them and get them to sign for it but it's even more boring to get them to do what they should be doing."

Senior Managers, med-large co

5.2 Awareness of regulations

Although seemingly full of good intent, many of the managers in our sample, both at middle and senior level, claimed to have difficulty keeping abreast of the seeming plethora of health and safety directives, regulations and general safeguards that should be in place.
There seems to be so much information and so many updates on information you've already got. You spend half your time filing the bloody things and it's like an Encyclopaedia Britannica before you know it.

Middle level, blue collar

Unless you are prepared to sit and read vast amounts it's very hit and miss. You hear things, even at business meetings you pick things up from what other people say and you think you better check that...you can't know it all and there is an element of having to learn as you go along...particularly in a smaller company where you can't have one person allocated to that role.

Senior Managers, small-med co

They tended to rely on a number of information sources:

- professional journals
- leaflets sent through from the HSE
- HSE inspectors
- union officials
- external seminars and courses
- safety bulletins/memo's issued by in-house health and safety officers
- word of mouth, informal networking
- clients/contractors

For every tender you have to agree Health and Safety before you can go ahead and do the job...you pick it up from there.

Middle level, blue collar

We get sent through these leaflets to hang on the wall. I think you have to have them.

Middle level, blue collar

Our clients made us aware. We have government contracts and government employees are very vociferous when it comes to health and safety, like they demanded that we provided eye screens for VDU's and our employees took note and insisted on it.

Senior Managers, small-med co

5.3 Awareness of potential hazards and how to manage them

Most managers in our sample had inherited a set of rules and procedures for dealing with known risks. They then use their knowledge and experience to deal with new situations as they occur. However decisions are often checked with the Health and Safety regulations to check they are covered for liability.
"You go and have a look and make a judgement for yourself. Whether that judgement is in compliance with the regulations is another matter – possibly not – I don’t go away and check the manual."

Senior Managers, small-med co

"You look at the problem and make a judgement based on common sense. The next step is to check with the Health and Safety Regulations Officer or whatever and check the action you have taken is right. It's more a question of covering your own legal position, your own liability, than anything else."

Senior Managers, small-med co

Recognition of new/previously overlooked risks and the best way to handle them occurs:

- after an accident/near miss
- via health and safety inspections
- through suppliers
- through consultation with the operatives
- through formal risk assessment exercises
- via employee concerns (expressed directly or through a union - see section 7)

"It is a bit hindsight. If you’d done this you’d have got round that. I think by luck most of the time... in my case anyway."

Senior Managers, small-med co

“We have full time Health and Safety officers. Theirs is a tough job as it’s targeted on accident levels and sickness levels and I don’t suppose they feel they pull all the lines.”

Senior Managers, med-large co

“You find out about it when something goes wrong.”

Senior Managers

“Rules change because things happen. Lessons are learnt. Before Kings Cross there were no fire alarms, fire escapes, smoke detectors... now there’s been a major change in management structure so there’s a manager responsible for each area."

Middle level, blue collar

“Inspectors point out various aspects. Things we didn’t realise.”

Senior Managers

“Working with hazardous materials, the Health and Safety aspect is very controversial a lot of the time. A lot of it is common sense, but if the operator of a machine, using the chemicals, spots a weakness somewhere along the line, then yes it’s great for them to come and tell you and you can do something about it before something happens – which does actually happen.”

Senior Managers, small-med co
"Site reps know what they are talking about, they know what the issues are, what all the regulations are. I mean if you use them properly they will tell you what you should be doing, they’ll know better. It works but it depends on the quality of the rep you have."

Senior Managers, med-large co

Although fully aware of health and safety procedures at their workplace, and keen to insist they are followed by the majority, a minority of experienced managers admitted to not always abiding by them themselves.

"Theory is very strict. We’ve got lots of safety procedures. Almost my entire job is involved with safety procedures. But it doesn’t always work on a day to day basis. There are a lot of short cuts that I as a manager might take, things that I might chase the staff for doing...it’s just a case of bending the rules when I feel it is safe to do it, using my judgement."

Middle level, blue collar
6. PROBLEMS ENCOUNTERED IMPLEMENTING GOOD HEALTH AND SAFETY PRACTICE IN THE WORKPLACE

Middle and senior management, together with some of the lower level workers, agreed that a number of barriers exist to the successful implementation of good health and safety practice.

6.1 Lack of knowledge

As discussed earlier, many managers felt they simply did not have the time or resources necessary to ensure that they are fully aware of all the directives and regulations that may be relevant to their workplace.

6.2 Engrained Practice

There was general agreement that it can be very difficult to ‘teach an old dog new tricks’ and had met considerable resistance among some older members of staff to new procedures which, whilst making their work safer, may also make it more difficult or time consuming.

"You can take a horse to water but you can’t actually make him drink it - that’s the real problem.”

Senior Managers, med-large co

"It’s impossible to change people’s behaviour. New ways are soon forgotten and they slip back.”

Middle level, blue collar

6.3 Workplace Culture

The macho culture of the building site was frequently quoted as an example of the workplace culture being antipathetic to the implementation of good health and safety practice. Other, less extreme instances of workers choosing not to follow certain procedures or use available protection were also cited.

Shop floor mores can also inhibit employees from passing on concerns about unsafe practices among their colleagues. (See section 7.2 ).

"The building industry is so macho....they’re not going to start... it’s almost a game to see how many roof lights you can jump across... they’ll not report anything.”

Senior Managers, med-large co

6.4 Human Error/Forgetfulness/Laziness

It is impossible to ensure that everyone always does as they should. Numerous example of accidents were quoted where individuals, although perhaps fully trained, had not paid full attention to what they were doing or had gone somewhere/done something they should not have done.
"The biggest problem is human error. There's no way you can foresee human error. There's always going to be someone trying to cut corners or work in an unsafe manner."

Middle level, blue collar

"The higher up they get the worse they are. The Doctors and consultants are terrible - they're always leaving things around...they get sloppy...we had a high risk patient in the operating theatre and the consultant surgeon put a syringe needle down on the table unsheathed, a nurse walked into it and punctured her stomach..."

Middle level, blue collar

6.5 Financial Constraints

The issue of finance arose time and time again in the discussions. It has essentially two faces. Firstly a tight budget can encourage corners to be cut wherever possible. In sectors which are not tightly regulated, most notably the smaller sub-contractor end of the building industry, the discussions suggested that health and safety practice often leaves a lot to be desired.

Lack of funds can also be a major obstacle to safer working conditions and safer services. Major improvements and repairs to infrastructure can be delayed or postponed indefinitely because of lack of finance.

"Minor things get done. The larger things I'm not so sure about. There are large things on my job where I know people have been killed and I know it's preventable but it costs a lot of money and so trying to report things like that...I don't think it would happen."

Middle level, blue collar

"You tell them about something but they don't do anything about it - it's all down to money."

Lower level, blue collar

"We used to have to take our break in the sluice room...we went through all the normal channels to get a proper room built...we were told no money was available...in the end it got so bad we made a fuss, called in the unions and Health and Safety and the money suddenly appeared."

Middle level, blue collar

Indeed it was acknowledged by some managers that trade-off analyses are conducted, balancing the cost of repair/improvement to safety with the cost of legal action in the event of an accident, together with the risk of it occurring.

"I've been at meetings where they've discussed the cost of killing someone versus the cost of a repair...I'm working at the moment on loss risk assessments...it is cheaper for someone to die than for us to do something...I'm sure it happens in a lot of industries."

Middle level, blue collar

Such analyses often result in the decision not to finance the safety improvement. To achieve maximum safety is simply prohibitively expensive for many organisations.
6.6 Other Conflicting Pressures

Several of the middle managers admitted that there are times when they deliberately chose not to follow a specific safety procedure or to abide by safety advice because other pressures, in their experienced judgement, should take priority. They did not regard these actions to be in anyway irresponsible, but to be the pragmatic decision based on conflicting needs. In their view they took the safest course of action given the needs of the situation.

"I have to account for everything at the end of an operation....there's a set procedure....but you can't always follow it...it's just not possible ...the count is still done, but not that way."

Middle level, blue collar

"I went to a broken rail a few weeks ago. I had 5 trains I had to get through...but then our response unit said I should not be running trains through that bit - it wasn't safe - but I still had 3 trains to get out. And I got them out, as I had to balance it against the number of people who'd be baying for my blood if they're stuck on a train for a long time or left stranded somewhere....It wasn't unsafe, it wasn't going to kill anyone."

Middle level, blue collar

It was also recognised that the pressures put on staff to work more productively can encourage unsafe practices

"A problem we have is the conflict between time and safety. There will always be engineers who take short cuts. It's difficult to get strict adherence to the rules. But if you had the engineers here they would say it was because the managers are continually driving them about productivity."

Senior Managers, med-large co

"The last serious accident we had was a couple of months ago when a guy lost an arm in a winch.....it turned out he'd put a block on the fail safe handle that made operating it quicker..."

Senior Managers

6.7 Possible Negative Ramifications For Reporting Concerns Or Taking Action

A number of respondents expressed the view that whilst reporting a health and safety concern may be a responsible act, they often thought twice about doing so because they did not wish to ‘get a name for themselves’, either among their colleagues or among management, as a troublemaker.

"If you tell your seniors about something they may put it right but you can be seen as a pain."

Middle level, blue collar
“I’d be reluctant... you don’t want to be that mouthpiece.”
Middle level, white collar

Equally, managers of companies working on a contractual basis did not wish to cause aggravation to their client by over zealously acting out their health and safety responsibilities. There was a feeling that one at times has to tread a careful path and use considerable diplomatic skills when promoting health and safety in an environment where other companies are also affected. In such instances the need to cover one’s legal liability can be a major influence on the decision to act on a concern.

“If you see something dangerous and you think the job should be stopped you should make sure it is....but if you stop the job it costs money... as well as having to protect other people from the hazards you see you also have to protect your own business.... it’s down to good management, approaching people in the right way.”
Middle level, blue collar

6.8 Abuses to the System

A view was expressed by some managers that individuals or unions can use health and safety issues for their own, less worthy ends.

“They can use health and safety regulations just to have a go.”
Middle level, blue collar

“Sometimes I think the rep’s sole aim is to bring up as many things as they can.”
Middle level, blue collar

“You get two types. You get the serious issue and you get the other issue which is just whinging, trying to avoid doing a day’s work.”
Senior Managers, med-large co
7. THE REPORTING AND HANDLING OF EMPLOYEE CONCERNS

7.1 Current Reporting Procedures

The majority of the sample were aware of formal procedures within their organisation for reporting concerns. This was usually in writing to their line manager who, if he could not deal with it himself, would pass the concern on up the line or to the relevant officer. The better systems included on obligation to reply within a specified period.

"We've got a 'what's wrong' form. You fill it out in triplicate. It has
to go to the responsible manager who must reply in writing in 14 days."

Middle level, blue collar

"You've got to put everything in writing. If there's an accident you have
to put that down."

Lower level, white collar

In reality concerns may not always be put in writing, especially if they can be dealt with on the spot. Equally staff may go direct to the appropriate post-holder (the facilities manager, health and safety officer) especially if the problem is felt to warrant immediate attention.

"Nine times out of ten we'll go straight to maintenance."

Lower level, blue collar

"If something needs sorting quickly you go straight to maintenance."

Middle level, white collar

In larger, unionised blue collar organisations, the union is recognised by both workers and management as an alternative reporting route. This is often seen as an easier, quicker and more effective means of achieving the desired result.

"Officially I'm supposed to go to my supervisor and then he takes it
up the line. But I usually go straight to the union and it works a lot
quicker."

Lower level, blue collar

"It means the workforce are able to refer their problems rather than
to a supervisor but to someone of an equivalent level who is a union rep...they probably feel a bit more comfortable."

Middle level, blue collar

"Union safety officers may be a pain but they get management to
do things."

Middle level, blue collar

For larger, non-unionised companies, the option to approach Personnel rather than one's line manager frequently exists. But both lower level workers and middle managers in other roles were often somewhat sceptical about the effectiveness of Personnel in this respect.
"I'd not bother going to Personnel if I wanted something done."
Middle level, blue collar

"I've been to Personnel lots of times but nothing seems to change."
Lower level, white collar

The smallest organisations represented in our sample tended to operate an ad-hoc open door policy, with employees being able to speak directly to the managing director or partner concerned. How each complaint is handled was left to his or her discretion.

"I deal with complaints on an ad-hoc basis. I don't record them.
I either action them or bin them."
Senior Managers, small-med co

Suggestion schemes were operated in a number of organisations represented in our sample but their success varied from being seen as next to useless to being considered genuinely useful. Offers of worthwhile rewards seem to raise their profile.

"Suggestion schemes are good. If someone comes up with an idea that makes our environment a better place to work in, then they get a cup on their desk saying they're 'safety person of the month'."
Middle level, white collar

Team meetings, where they occurred, were generally felt to be a worthwhile forum for raising issues and suggesting improvements.

"We have regular team meetings to encourage everyone to take ownership of the problems and to feel confident to feedback concerns."
Middle level, white collar

"We have Friday forums. Every month all groups get together and talk. It does work. You hear all sorts of criticisms and suggestions about improving profitability, working practices...60% may be useless, but 40% is really valuable."
Senior Managers, med-large co

7.2 Lower Level Workers’ Attitudes

Among both white and blue collar workers there was a noticeable difference in how people said they would treat a concern about a procedure, piece of equipment or the structure of the building and how they would behave if worried about the behaviour of an individual.

Most felt no qualms about reporting a potentially hazardous machine. They would alert their supervisor, union representative or health and safety officer without hesitation. The same would apply to a concern about an aspect of the building or some office furniture.
A minority, usually those working in environments where health and safety monitoring was considered to be relatively slack, were a little more cautious. Not wanting to be seen as a whinger or a trouble maker, they would seek the support of colleagues before making the complaint. If this was not forthcoming, whether it be as a result of the workplace ‘macho’ culture or a general malaise, a passive acceptance among the workforce of their conditions, then the concerned individual may choose not to stick their neck out but to learn to live with the risk or, if they were very worried about it, they may decide to leave the organisation.

"A lot of the time you just keep it to yourself and just make sure it’s not going to affect you."
Lower level, blue collar

Should the behaviour of a person or persons be the focus of concern, the situation was invariably felt to be very difficult. Almost everyone expressed concern about alienating themselves from their peer group by being seen to ‘grass’ to management.

"You’d get sent to Coventry because you’re in with management."
Lower level, blue collar

"You’re a squealer."
Lower level, blue collar

Such an attitude was particularly striking among the lower level blue collar workers. If an individual is behaving in a potentially dangerous manner, they would initially approach him themselves, but often only after seeking and obtaining the backing of their peers. Should the person concerned ignore the approach, a judgement would then be made. If the behaviour was considered to be very dangerous, with possible implications for others, the individual or individuals concerned would be reported either to management or to the union. If the behaviour was felt not to impinge directly on others, especially those in the tightly knit peer group, the offender may be allowed to continue unreported.

"I had to report my brother once...driving like a mad-man...it was in his interest because he was going to kill someone."
Lower level, blue collar

"A lot of accidents are down to people’s stupidity - I’ve got no problems with telling someone."
Lower level, blue collar

"If it’s going to affect me directly - maybe injure me or if I’m responsible for it and would get the blame then yes - I’d report it."
Lower level, blue collar

Many expressed the view that it is difficult to challenge the behaviour of a colleague who has been in the organisation a long time, especially if that person is part of a well bonded team. In these circumstances, individuals who have less confidence in their own status within the group may opt to keep their concerns to themselves and just make sure they are affected as little as possible by the offending behaviour.
"They say they've always done it like that and they're not changing." Lower level, blue collar

"They're set in their ways - they don't listen." Lower level, blue collar

"They don't like someone who could be their son or daughter telling them what to do." Lower level, blue collar

Should the bad practice be that of a supervisor, the politics of the situation were clear. The individual would be reported without hesitation.

Evidence of a 'them' and 'us' culture was less evident among the lower level white collar workers. Nevertheless, white collar workers were keen to retain good relationships with colleagues and consequently thought a concern about a work-mate would have to be handled very carefully. The appropriate action to take would depend on the relationship between the individuals involved. In some cases a direct approach may be best, in others an approach via a third party - a supervisor or a more senior member of the group - keeping the complainant’s identity in confidence, may be the best means of achieving a satisfactory conclusion. If the bad practice was not considered to be positively dangerous, and this was usually the case, many admitted they may choose to ignore it rather than risk upsetting the status quo.

"I'd not say anything as I'd have to work with them....it depends how hazardous it is." Lower level, white collar

Should the behaviour of a supervisor or manager be causing concern, the issue was felt to be more difficult. Whilst some claimed they would simply go over their heads and report them to more senior managers, the majority were less certain. An option may be to go outside line management, usually to Personnel or to the Health and Safety Officer, perhaps to the staff association if it exists, but there was still concern they may be stirring up trouble for themselves.

"If it's your boss that tells you to do something dangerous you need to go outside the line." Lower level, white collar

In reality most could not envisage such a situation occurring. If it did happen, the white collar environment is such that most lower level respondents felt they would be more likely to change employer than to challenge their seniors over a health and safety issue.

7.3 The Attitudes of Middle and Senior Management

The role of employees in identifying potential hazards in the workplace was recognised by both senior and middle managers. The majority claimed to encourage workers to report their concerns and to consult them before introducing any changes. This was particularly the case with small-to-medium sized manufacturing companies where management and staff enjoy a co-operative, constructive relationship.
"We have the operators look over the machinery when it comes in now. It can have lots of guards all over, lots of stop buttons, this that and the other, but there can be something very simple to an operator - 'look you can stick your finger in there.'"

Senior Managers, small-med co

However, even in these environments it was recognised that peer group bonding is prevalent and that 'grassing' on a colleague is not seen as acceptable practice.

"There's a difference between shopping an individual and shopping something that affects everyone."

Middle level, blue collar

"The printers themselves all have their own little quirks, been doing it for a million years. And no, they wouldn't be grassing each other up. It would be accepted."

Senior Managers, small-med co

"I don't think people will grass, whatever."

Senior Managers, med-large co

Managers in larger organisations stressed the importance of reciprocity and an open culture.

"I think it's very much a two way employee-employer relationship. We provide a good or excellent working environment and they provide honesty to come back or whatever. It depends if you have an open management or not, we have and it works well."

Senior Managers, med-large co

However, some admitted to not encouraging employees too fervently for fear of being inundated with trivial issues. They also recognised that staff at all levels who may be a bit overly conscientious can become labelled and even have their career suffer as a result.

"If everything was reported it would be all management would deal with all day."

Middle level, blue collar

If you promote it too strongly, well in a bigger organisation you are bound to have someone who is a complainer by nature and if you actually invite people to criticise they are going to have a field day aren't they?"

Senior Managers, med-large co

"But if you are seen to be the person always complaining about X, Y, or Z you get your name on a list."

Senior Managers, med-large co

A minority admitted to not always welcoming employee concerns, especially when time and/or money is tight.
“Sometimes you don’t want that interference. It all costs money.”
Senior Managers

“We positively promote people coming forward. On each site we have union reps that do that... but it’s with a heavy heart when you get a tap on the shoulder and you think ‘Oh God, here we go again’.”
Senior Managers, medium-large co

The majority of middle managers expected their juniors to report any concerns initially to them. They interpreted a decision to by-pass them badly, worthy of a reprimand.

“I’d want to be the first person they’d turn to - or at least to tell me what they’re doing.”
Middle level, blue collar

“If they went over my head they’d feel the sharp end of my tongue.”
Middle level, blue collar

“I would see it as a way of trying to get me into trouble.”
Middle level, white collar

An exception to this were the managers who worked in unionised blue collar sectors. They recognised that union representatives can play a helpful role in the management of health and safety conditions at work. Indeed it was felt that a good union representative can lighten a manager’s load by filtering out time-wasting complaints and, in some instances, by by-passing the immediate line management system and going direct to the decision makers. Senior managers totally concurred with this view.

“The union would take it to the health and safety officer... it takes out the conflict between the operator and the supervisor.”
Middle level, blue collar

“We tend to encourage them to go through the union, to get away from the professional whinger. It works better.”
Senior Managers, medium-large co

“If they go to the unions it’s easier for me - less hassle.”
Middle level, blue collar

When dealing with an employee’s concern, middle managers claimed they would try to sort the problem out themselves, and to avoid going higher up the line if possible. They had no problem reprimanding their juniors and would draw other managers’ attention to the behaviour of lower level employees not under their direct jurisdiction.

“Part and parcel of your job as a manager is if you see something you’re not happy with you pull them to one side and do something about it.”
Middle level, blue collar
Most were aware of known ‘whingers’ and handled those complaints in a manner that they felt to be appropriate. The ability to differentiate between a genuine concern from a responsible individual and a trivial issue raised by a moaner was seen to be part of good management.

“You can spot them a mile off - you just take them with a pinch of salt.”

Middle level, white collar

“A smiling face seems to solve a lot of things.”

Senior Managers, med-large co

Some found themselves having to handle concerns about the health and safety practices of other organisations with whom they work. (See section 6.7) The diplomatic skill required to achieve a satisfactory solution whilst retaining good relations was also seen as part of being a good manager.

“If you report everyone you get a reputation and you’re looking at your next job...you’ve got to be careful how you speak to certain people if you want to work with them again.”

Middle level, blue collar

7.4 Reporting Outside The Organisation

Most respondents could not realistically envisage a situation when they would report a health and safety concern to an external body, other than to a union.

There was a general consensus that every possible route within the organisation must be followed beforehand.

“It’s important to follow the procedures, to give everyone a chance. Your supervisor, his boss, then his boss.”

Lower level, white collar

If this met with no success, then they might consider contacting the Health and Safety Executive - who’s telephone number they know to be on posters displayed at work. However, they would only contact the HSE if they thought the problem to be very serious.

“It depends how big the problem is. I would do if there was real danger.”

Lower level, white collar

“I’m certain that if I did report that something was wrong it would be acted upon...but if it wasn’t I’m sure a call to the HSE would do the trick...they’d put pressure on...their address is at the bottom of posters.”

Lower level, white collar

“Only if it’s really important, like it could cause death. If you’re being forced to do a procedure that’s dangerous.”

Lower level, white collar
"You'd only go to the HSE as a last resort...you'd be worried whether you were going to keep your job or not."

Middle level, white collar

Concern for their job security prevented many from having the confidence to follow a complaint through. There was considerable confusion about whether or not one could claim unfair dismissal under such circumstances, but even then there may not be another job to go to - especially if you are branded a trouble maker.

"The Railway Inspectorate are seen as the enemy. I know one manager who did report to the Railway Inspectorate and although no one's done anything about him, I don't think his chances of getting another job are very good because he will always be known as the person who blew the whistle and no one else will want him."

Middle level, blue collar

"You're out on a limb - it's our word against theirs"

Middle level, white collar

"But my company would really see me as a trouble maker if I had gone elsewhere with an issue."

Middle level, white collar

"It's difficult, you've got to think about your job."

Lower level, white collar

White collar workers, whose skills were more in demand, simply did not feel it to be worth the trouble. Rather than pursue a complaint, it is easier to leave the organisation and take employment elsewhere. Only the minority who were members of strong unions felt the confidence to insist that their concerns are addressed by management.

"We don't have unions. You're on your own. Do you want to take the company on?"

Middle level, white collar

"I couldn't be bothered. I'd complain first. If nothing was done I might leave."

Lower level, white collar

"You can't take on a company on your own. It's easier to leave."

Lower level, white collar

"I'd turn to my staff association if my manager didn't do anything."

Lower level, white collar

"I'm sure the union would pick up on things if they weren't done properly."

Middle level, white collar
Senior managers also, predictably, took the view that every internal procedure should be followed before going outside. However, they recognised the need for an external agency with powers to investigate and, if necessary, shut down operations. A few had had experience of their organisation being reported to the HSE and considered the inspectors behaved in a very fair and proper manner.

"Most responsible employees want to irradiate danger. They may be ignorant of regulations, in fact most probably are, so to just go and whistleblow on them without going to them and asking them to rectify it..." 

Senior Managers

"Health and Safety is not completely black and white but nearly. It's very clear if you have broken the law. I wouldn't have a concern about outside agencies being involved, although I might be irritated by it. But I could understand it." 

Senior Managers

"It is reasonable to go outside if you are ignored by management and genuinely feel there is an issue to be looked at."

Senior Managers

The media were not seen to be the right people to contact, or only as a very last resort. However, the threat of media coverage may be highly effective at forcing a reluctant management to address the problem.

"The media will blow it out of all proportion whether it's right or wrong."

Senior Managers

"You would question their motives. If they're trying to correct a health and safety issue the media won't help."

Senior Managers

"It's good as a threat... I can say - 'Right, I'm going to take it further'.'"

Middle level, white collar
8. ATTITUDES TO ‘PUBLIC CONCERN AT WORK’

Only a small minority had heard, upon prompting, of Public Concern at Work and even these were unsure of the organisation’s raison d’être.

After explanation, the majority of white collar employees and blue collar middle management considered the charity to be a potentially valuable fall back option should they ever experience problems in this area that they wished to pursue. They assumed it to be a more professional, informed version of the citizen’s advice bureau or a legal advisory service for those who do not have union resources to turn to.

“It would be good to have them as an advisory body - somewhere where you could go to get advice one-to-one.”

Middle level, white collar

“We haven’t got a union, so we haven’t got anyone to give us a bit of advice.”

Middle level, white collar

“They wouldn’t get directly involved, but just assist me in how I should go about it.”

Middle level, white collar

“They can tell me if I have a leg to stand on.”

Middle level, white collar

“The Citizen’s Advice Bureau are next to useless...They’re full of good intentions but just give leaflets out....they don’t actually know much...these people might be better...”

Lower level, white collar

All saw it as vitally important that all calls are treated in strictest confidence and that an individual can call from home, out of working hours, to avoid any possible recriminations.

Blue collar workers who enjoyed union representation saw no need for Public Concern at Work. Lower level employees who were not union members endorsed Public Concern at Work’s aims but were usually too concerned about losing their job or being seen to be a troublemaker/whinger, to think themselves likely to follow a concern through to this point.

“You just get on with it. If the media get to hear of it there’s always someone in the dole queue ready to take your place.”

Lower level, blue collar

Respondents in the Senior Manager group were far from enthusiastic. Their stance was essentially defensive. They were concerned about advice being given on incomplete information and that it may add to rather than solve problems. In the presence of the Health and Safety Executive, no one saw a real need for Public Concern at Work as an advisory body on raising health and safety concerns.

“I won’t put it up on my notice board. It would open up doors that needn’t be.”

Senior Managers, med-large co
“The advice can be based on lack of knowledge. ‘If what you say is true my advice is’... you’re almost winding the employee up only to find they’ve only had half the facts... I’d rather have someone come in with powers to investigate than someone on the outside dabbling in the surface of it.”

Senior Managers
9. CONDITIONS AND PRACTICES PERCEIVED TO PROMOTE HEALTH AND SAFETY

The following conditions and practices were felt to promote health and safety in the working environment:

9.1 Modern Facilities

A modern, purpose-built building should have been designed with health and safety in mind. It is also, presumably, less likely to require major repair works.

"It's the old buildings that are the problem."

Lower level, white collar

9.2 Well maintained, frequently checked equipment and machinery

Seemingly obvious, but a few respondents reported accidents that had occurred as a result of faulty machinery.

"This lifting equipment snapped and someone was crushed under a 30 ton truck... It's checked more often now and there's this thick book of rules we have to read and sign."

Lower level, blue collar

9.3 Safeguards in Place and Used

These safeguards could be physical guards such as shields, goggles etc or they could be good practice safeguards such as regular breaks for VDU operators. Regular risk assessments should be carried out to ensure all possible safeguards are identified and in place.

9.4 A Named Health and Safety Officer

A focal point for all health and safety issues, the officer should be responsible for keeping abreast of all related directives, regulations etc, disseminating the information to the appropriate personnel, monitoring conditions in the work place, providing training and advice and dealing fairly with employee concerns.

"The health and safety officer should be independent, with authority on both sides of the fence - his job is to look after you."

Lower level, blue collar

"If the line manager was always responsible you wouldn't have a Health and Safety Executive - you do need a dedicated Health and Safety Officer."

Senior Managers
Clearly in large organisations there will be a need for several health and safety officers, whilst small companies will not be able to resource a dedicated post. However, even if the post holder also has other responsibilities, management should stress the importance of the role and ensure it is performed diligently. Numerous respondents in the sample commented on how the quality of the individual officer can affect the safety of their working environment.

"The Health and Safety Manager must be good, with eyes everywhere. You need good individuals."

Lower level, white collar

9.5 Thorough Training

Most accidents, it was claimed, are the result of human error. Thorough training on all aspects of the job reduce the likelihood of this occurring. Training on general aspects of health and safety procedure should also take place for every new member of staff and should be given equal emphasis to role-specific training. Refresher courses for long serving staff should also be run.

"People don’t notice leaflets, but they can’t get out of training days."

Lower level, blue collar

9.6 Good Communication and an Open, Co-Operative Culture

A culture that encourages all employees to feel a sense of responsibility for each other’s health and safety and to report any concerns they may have, was unanimously seen as vital to the effective promotion of health and safety in the work place.

"You need a culture where concerns are taken seriously, where health and safety is important and you are doing the right thing by raising a concern."

Lower level, white collar

"Make people feel responsible for reporting things - anything that is a danger or a health hazard."

Middle level, white collar

However, management must be seen to listen, to take concerns seriously and to take appropriate action. Communication must be two way, with employees being kept informed as to the 'progress' of their concern.

"You should have monthly reviews to deal with what's happening on issues that have been raised."

Lower level, white collar

"They should be actually talking to the people who are going to be working in that place - they haven't actually got to work in that environment and can't see the problems."

Lower level, blue collar
It was clear that many blue collar, lower level workers were disillusioned with management, feeling they only responded to concerns after an accident or where they may be financially liable, rather than to protect the workers. As a consequence, there was evidence that some had adopted a more insular ‘look after ourselves’ attitude. This needs to be overcome.

9.7 Clear and Effective Reporting Procedures

Linked to the proceeding point, employees should all be made aware of the route they should take when wishing to report a concern. The report should be made in writing and the recipient should be obliged to reply constructively within a specified period.

"Give the staff a chance to report anything they have seen and it must be acted upon, or at least acknowledged."

Middle level, white collar

"It helps morale. Makes them feel valued, to feel they’re being listened to."

Middle level, white collar

"Everything should be documented and so you can always get at it to check."

Lower level, white collar

Whilst employees should be encouraged to report their concerns to a specific person/position - usually their immediate supervisor - an alternative route should be available for those who feel uncomfortable with this for any reason or who have not met with success by going up their line. Such a route could involve the union representative, Personnel or direct contact with the Health and Safety Officer.

"You need an independent person to go to."

Lower level, white collar

"If the manager is the problem you have to have an alternative."

Senior Managers

9.8 Union Health and Safety Representatives

Among our sample, unions were usually only felt to have a meaningful presence in the blue collar environment. Here they were largely seen by both management and lower level employees as having a positive influence on health and safety in the work place.

Although very much down to the quality of the individual who holds the post, union representatives were generally felt to help both the shop floor and middle management:

• are usually well briefed on health and safety issues. Some managers relied on union officials as a major source of information on such matters

• an accessible port of call for employees who feel uncomfortable voicing their concerns to management

• able to identify and filter out the genuine concerns from the time wasting whinge, thereby saving management hassle
• have a direct line to a health and safety manager, can save middle management work by by-passing them

• often have more sway with budget holders. Are more likely to effect improvements.

“Union Health and Safety reps can work with you....they don’t try and get things over on you. They have more clout.”

Middle level, blue collar

“Site reps know what they are talking about, they know what the issues are, what all the regulations are. I mean if you use them properly they will tell you what you should be doing, they’ll know better. It works but it depends on the quality of the rep you have.”

Senior Managers, med-large co

9.9 Assurances of Confidentiality

Although ideally any employee should not feel inhibited when voicing a health and safety concern, since all they are doing is acting responsibly; in reality it was agreed that there may be occasions, especially when the concern relates to a colleague or supervisor with whom one must work, when the complainant may not wish their identity to be widely broadcast for fear of reprisal.

Since many accidents are caused by human error or bad practice, an assurance of confidentiality was thought to be important if employees are to be encouraged to report such matters.

“You shouldn’t have to worry about confidentiality as it’s a sign of responsibility.”

Lower level, white collar

“I might be worried if I had to go over my supervisor. Confidentiality may help there.”

Lower level, white collar

“Confidentiality can help. You must deal with things sensitively. Otherwise people will think twice before complaining.”

Middle level, blue collar

“You need to create an environment that encourages people to come forward. If the nature of the work doesn’t, if there’s a real speed element where short cuts can be taken, you may have to design a process that will allow people to escalate their concerns anonymously.”

Senior Managers, med-large co
9.10 Discourage Anonymity

Anonymous reporting was considered to be at odds with an open, responsible culture.

There was a general feeling that it is open to abuse. It may also prevent a genuine problem from being investigated as thoroughly as it deserves since it is difficult to follow up on reports that are not sufficiently specific. As a result anonymous reports carry less weight and should be discouraged.

"It's almost pushing it underground. I don't see the benefit."
Senior Managers, med-large co

"If someone says there's a problem on the 2nd floor and you can't see it, how do you go back to the person to find out more? You can't post a notice on the board saying 'would the person who... there is a problem if the complaint is indecisive or not exact in its nature.'"
Senior Managers, med-large co

9.11 Team Meetings

A few respondents' organisations held regular team meetings at which any points could be raised. These were seen to be a productive forum both for cascading information and for raising issues, including health and safety.

"Our manager goes on courses and he feeds back to us what he's learnt or the results of comments we've made."
Lower level, white collar

9.12 Suggestion Schemes

Were often thought to be useful, especially when an incentive is provided.

9.13 Good Planning

The minimisation of risk is now seen to be an important part of any project. Large and public sector organisations are increasingly insisting that sub-contractors provide them with detailed method statements and sign up to their stringent health and safety practices. Consequently health and safety must be planned and costed for in advance.

The civil engineer in our sample had noticed an increasing use of 'Planning Supervisors' at the planning stage whose role is to minimise the risk that will be involved in any project by looking for alternative, safer methods of doing things.
APPENDIX 1

We are not permitted to provide a detailed breakdown of the individuals who attended each group discussion and the organisations they were employed by. However, the following information conveys the ‘flavour’ of each group:

Group 1 - lower ranking, blue collar

- hairdresser in small salon
- cook in company canteen
- assembler for large manufacturing company
- auxiliary nurse
- furnace operator for large manufacturing company
- tool setter for medium sized manufacturing company
- power grinder for medium sized manufacturing company
- mechanic at an airport

Group 2 - lower ranking, white collar

- draughtsman for privatised utility company
- customer services advisor for airline
- secretary for large privatised organisation
- sales administrator for car franchise company (medium sized)
- IT administrator for large manufacturing company
- receptionist/telephonist for large pharmaceutical company
- counter clerk for high street building society
- computer operator for agricultural company

Group 3 - middle ranking, blue collar/on site

- site manager for medium sized construction company
- manageress of hairdressers (small chain)
- print manager of print production company
- initial training manager large retail organisation
- laundry supervisor for in-house laundry
- senior maintenance officer of local council
- contracts manager - large construction company
- duty manager - public transport organisation
- nursing sister - NHS and private hospitals
Group 4 - middle ranking, white collar

- branch manager high street bank
- sales manager for medium sized manufacturing organisation
- trade marks lawyer for large manufacturing company
- sales office manager for medium sized wholesale company
- supervisor for financial services organisation
- transport manager for distribution company
- reception manager for IT company
- accountant for public service organisation

Group 5 - Senior Management

- Regional Manager for ink manufacturing company
- Financial Director for electrical wholesaler
- Commercial Director for international service organisation
- Partner in firm of chartered surveyors
- Senior Building Surveyor for local authority
- International Human Resources Manager for IT company
- Senior Control Manager for privatised utility
- European Personnel Manager for IT company
APPENDIX 2

Public Concern - Employees Topic Guide
(Groups 1-4)

1. Introduction. Establish rapport. Each respondent introduces themselves and briefly describes the nature of their job, their organisation and the nature of the sector in which it operates.

2. What does ‘health and safety in the work place’ mean? What does it bring to mind? How do you interpret it? What sort of things come to mind? With which types of jobs is it more of an issue? Why do we think of these? Are there some jobs where health and safety is not really relevant? Which? Why? Why not?

3. How much emphasis is put on health and safety issues in your work place? Why do you think this is? How is health and safety promoted, if at all? How satisfactory do you find this? Have things changed in recent years? If so, how and why?

4. What risks do you personally encounter at work and/or are responsible for dealing with? How do you deal with them? How do you know how to deal with them? Is this what you should be doing? Why/why not? How do you feel about the situation?

5. What health and safety responsibilities do you feel you personally have? How far do these responsibilities extend? e.g. within department, within all employees, customers, to public at large? How are you made aware of them? What responsibilities do more junior employees have? What about senior managers? How do your responsibilities actually work in practice? What about others?

6. Have you ever noticed a risk at work that is not, in your view, being well managed? What have you done about it? Why did you choose that course? What was the outcome? How do you feel about it?

7. Have there ever been accidents or near misses at work? How were they handled? What lessons were learnt? How were these lessons promoted and received? (by both managers and employees)

8. What would you do if you noticed a potential hazard tomorrow? What factors would affect what you do or don’t do? Who would you talk to? Why them? What concerns may you have? How confident are you that the matter would be dealt with (in the way you think it should be dealt with)? What if it were not? What would you do? How would you feel?

How would you expect others to respond to you?
- your peers
- immediate line manager
- other senior people

Would you be seen as ‘grassing’, a trouble maker or a responsible employee?

If you were called a ‘Whistleblower’ would it be an insult or a complement?
Middle management/supervisors: How would you feel if a junior employee for whom you were responsible reported a concern to someone else?

9. Is there a difference between the way you would respond to a risk that directly affects you and one that you have no direct responsibility for?

Is there a difference between the way you would react to:
- a machine being at fault
- a procedure being at fault
- an individual being at fault

10. How do management find out about risks in your organisation? How confident are you that all risks have been identified and dealt with by management? Why is this?

11. What procedures exist for health and safety reporting in your organisation? How well do they work? What are the strengths and weaknesses? Which are the most effective? How could they be improved?

Specifically explore attitudes to:
- Anonymous reporting
- Assurances of confidentiality
- Procedures outside immediate line management
- Health and Safety Officer
- Role of Trade Unions


13. Summarise by describing the ideal way for organisations to encourage and deal with employee concerns. What procedure, assurances and culture would be in place? How near are their organisations to this ideal? Would this ideal be 100% successful? If not, what else needs addressing?

14. Thank and close.
Public Concern - Senior Manager Topic Guide
(Group 5)

1. Introduction. Establish rapport. Each respondent introduces themselves and briefly describes the nature of their responsibilities, their organisation and the nature of the sector in which it operates.

2. What does 'health and safety in the work place' mean? What does it bring to mind? How do you interpret it? What sort of things come to mind? With which types of jobs is it more of an issue? Why do we think of these? Are there some jobs where health and safety is not really relevant? Which? Why? Why not?

3. How much emphasis is put on health and safety issues in your organisation? Why do you think this is? How is health and safety promoted, if at all? How satisfactory do you find this? Is the balance right? Have things changed in recent years? If so, how and why?

4. What risks do your work force encounter? How do you personally become aware of them? How do you deal with them? How do you know how to deal with them? How do you feel about the situation? Are you confident that all risks have been identified and dealt with? Why/why not?

5. What health and safety responsibilities do you feel you personally have? How far do these responsibilities extend? e.g. within department, within all employees, customers, to public at large? What responsibilities do more junior employees have? Are these responsibilities ever put into practice? How do they work in practice?

6. Have you ever been made aware of a risk at work that was not, in your view, being well managed? How did you become aware? What have you done about it? Why did you choose that course? What was the outcome? How do you feel about it?

7. Have there ever been accidents or near misses at work? How were they handled? What lessons were learnt? How were these lessons promoted and received? (by both managers and employees)

8. What is the relative importance of employees reporting concerns in the organisation's risk management strategy? What factors are likely to influence employees when deciding whether or not to report concerns?

9. What procedures exist for health and safety reporting in your organisation? How well do they work? What are the strengths and weaknesses? Which are the most effective? How could the systems be improved?
10. Specifically explore attitudes to:
   - Anonymous reporting
   - Assurances of confidentiality
   - Procedures outside immediate line management
   - Role of Health and Safety Officer
   - Role of Trade Unions
   - Different means of communicating health and safety issues to the work force


12. Summarise by describing the ideal way for organisations to encourage and deal with employee concerns. What procedure, assurances and culture would be in place? How near are their organisations to this ideal? Would this ideal be 100% successful? If not, what else needs addressing?

13. Thank and close.
Safety Cultures:
Giving Staff a Clear Role

PART IV:
REPORT ON EMPIRICAL RESEARCH

Health and Safety Risks: The Role of Employees
as viewed by Health and Safety Managers

A Report by Public Concern at Work
PART IV

CONTENTS

<table>
<thead>
<tr>
<th>CONTENTS</th>
<th>PAGE</th>
</tr>
</thead>
<tbody>
<tr>
<td>1.0 Introduction</td>
<td>2</td>
</tr>
<tr>
<td>2.0 Key Findings</td>
<td>4</td>
</tr>
<tr>
<td>3.0 Summary</td>
<td>6</td>
</tr>
<tr>
<td>4.0 Conclusions</td>
<td>10</td>
</tr>
<tr>
<td>5.0 Methodology</td>
<td>12</td>
</tr>
<tr>
<td>6.0 Respondents</td>
<td>13</td>
</tr>
<tr>
<td>7.0 Learning of Risks</td>
<td>14</td>
</tr>
<tr>
<td>8.0 Employee Concerns</td>
<td>16</td>
</tr>
<tr>
<td>9.0 Encouraging Concerns</td>
<td>19</td>
</tr>
<tr>
<td>10.0 Obstacles to Concerns</td>
<td>22</td>
</tr>
<tr>
<td>11.0 Contractual Provisions</td>
<td>26</td>
</tr>
<tr>
<td>12.0 Reporting Procedures</td>
<td>28</td>
</tr>
</tbody>
</table>
1.0. Introduction

1.1 The cost of accidents & ill-health - a burden on business
According to the Health & Safety Commission (HSC), accidents and work-related ill-health cost British businesses between £4.5 billion and £9.5 billion in 1990 alone - an average of between £170 and £360 for every person employed.\(^1\) While the general trend over recent years for workplace fatalities and major injuries has been downwards\(^2\), the HSC estimates that about two million people suffer from work-related ill-health and that every year there are over one million injuries as a result of accidents at work.\(^3\)

1.2 Lessons from the past
Many accidents are preventable. Even major disasters, such as the sinking of Herald of Free Enterprise in 1987, and the explosion on the Piper Alpha oil rig in the North Sea a year later, might not have occurred if the risk had been appreciated and prompt remedial action taken. In the report into the Herald of Free Enterprise disaster, Mr Justice Sheen found that on no fewer than five separate occasions crew members had said they were concerned about the safety implications of roll-on, roll-off ferries sailing with their bow doors open, and made prudent safety suggestions for addressing the situation.\(^4\) Nothing was done about this information - the middle managers on shore to whom it was conveyed did nothing about these proposals for improvement. Mr Justice Sheen commented that had '[this] sensible suggestion...received, in 1985, the serious consideration which it deserved, it is at least possible that [the indicator lights] would have been fitted in the early months of 1986 and this disaster might well have been prevented'.\(^5\) If communication failures between employees and managers have been found to be a contributing factor in such major disasters, then it is likely that they will also play some part in smaller incidents where no public inquiry follows the event.

1.3 Prevention is better than cure
Public Concern at Work believes that the early detection and correction of a health and safety risk is far better than enforcement action after the accident has occurred. In this context, the first people to notice risks to health and safety will often be junior employees. Yet, for a variety of reasons, employees may not feel able to raise their concerns about health and safety. A recent study into industrial relations in the North Sea oil industry concluded that minor injuries (involving less than three day absences) ‘tend to be systematically under-reported...because there are strong counter-incentives to absenteeism once a worker is on a platform’.\(^6\) Another reason might be fear of reprisals from management: Lord Cullen's inquiry into the Piper Alpha explosion found that '[oil platform] workers do not want to put their continued employment in jeopardy through raising a safety issue that might embarrass management'.\(^7\) It is worth noting that although this inquiry led directly to the enactment of specific legislation to provide protection for offshore oil workers, it is not clear that this protection has effectively countered the reluctance of off-shore workers to raise health and safety concerns.\(^8\) While all employees now have, from the first day of their employment, protection against unfair dismissal and victimisation for raising health and safety issues in certain situations, it is equally unclear what effect this additional protection has had on the willingness of employees to raise concerns about workplace health and safety.
1.4 Public Concern at Work
In order to encourage employees to raise and employers to address concerns about serious malpractice or illegality at work, Public Concern at Work runs a free and confidential legal advice service so that employees can raise such matters in the most constructive and effective way. In our experience, the provision of this confidential advice service greatly reassures employees who are unsure as to how best to raise their concern. By discussing the issue with us, they can evaluate whether their concern really does have substance and if so, whether they feel able to raise it and how best to do so.

1.5 This survey
In order to understand the human, practical and organisational factors which can affect decisions about whether to raise health and safety concerns, we decided to conduct a pilot survey of 225 organisations from 15 major sectors. The survey was sent to the health and safety manager in each organisation and sought that person’s views and experiences on a number of important matters. We asked respondents what importance they attached to employee reporting as a source of information about risks to health and safety, why employees might not report their concerns about health and safety, and how they could best be encouraged to do so. The results are set out below.
2.0 Key findings from the survey

Key Findings

94 responses were received from 225 posted questionnaires, a response rate of 42%. Below are the main findings:

Sources of information

- 94% of respondents said that employee concerns about health and safety matters are a means by which they can learn of risks and dangers in the workplace;

- 48% of respondents rate these concerns as very important sources of such information. Small and medium-sized organisations were more likely than large ones to regard employee concerns as very important.

How concerns are raised

- 75% of respondents say that employees mostly report concerns about risks to health and safety to their line manager. A further 43% cite health and safety representatives or committees as a frequent route for reporting concerns;

Obstacles to raising concerns

- More than 75% of respondents agreed that employees generally might not report risks or dangers because they think it is someone else’s job or they could not be bothered or they do not recognise the risk;

- 61% of respondents said their own organisation had had experience of employees not reporting concerns because it’s someone else’s job, they couldn’t be bothered or they did not recognise the risk. Small organisations had less experience of their employees feeling inhibited about reporting concerns.

- 23% of respondents said that employees in their organisation had not reported health and safety concerns in the past because they were uncertain of their manager’s response.

Obligations, Assurances and Procedures

- 50% of respondents stated that employees in their organisation are under a specific contractual obligation to report concerns about health and safety. Two-thirds of these had had experience of employees not reporting health and safety concerns, most commonly because they thought it was someone else’s job;

- 57% of respondents said that they gave employees an assurance that they would be protected against adverse repercussions if they reported health and safety concerns;

- 56% of respondents said their organisation had a specific procedure for employees to use in reporting concerns to someone other than their line manager. However, only three of these were small organisations;

- Three quarters of those with a procedure (40) said its availability had made a
**moderate** or a **high improvement** in the overall health and safety performance of their organisation.

- Of the 40 respondents who had both **procedures** giving employees an alternative route to line management and **contracts** requiring employees to raise their concerns, 38 said that they had noticed a marked improvement (**moderate** or **high**) in the overall performance of health and safety in the organisation.

**Small organisations**

- Most respondents from small organisations felt that their enterprise was too small to have formal or structured reporting procedures. Common responses were that employees could speak to the managing director at any time on any issue and that the managing director would be constantly aware of any problems him or herself.
3.0 Summary

3.1 Reporting health and safety concerns: getting the culture right
One of the key messages from this survey was the emphasis placed by many managers on communication - often via informal talks - with the workforce, in order both to reinforce the need to report health and safety concerns and to send clear signals that there would be no adverse repercussions for so doing. One health and safety manager from a large food producer said that his company:

[has] many informal routes - part of the organisation's culture is free, open and easy communication. That culture promotes the sharing of problems.

Another manager, from a large textile company, said that in his organisation:

Employees, individually and through their unit health and safety committees are encouraged to raise any concerns that they have. All are investigated openly and results fed back to the employees at the base unit and circulated to all other units when risk assessments are conducted in their area. We believe that openness, consultation and notification are of prime importance.

The philosophy behind the promotion of a good health and safety culture was described in the following way by the managing director of a small leisure company:

We are always on the look out to avoid worker discomfort in the workplace, we feel that healthy people think better and are less likely to cause accidents around us. We discourage short cuts around the job function and train our staff almost on a constant basis - expert and novice alike - we seek them to co-operate with others clearly with no come backs to the job in progress.

This reinforces the message promoted by the Health and Safety Commission: “Good health and safety is good business”.

3.2 The effects of the wrong culture
Some managers highlighted what they saw as shortcomings in their own organisation in the context of proactive health and safety cultures. One from a medium-sized waste company stressed the importance of clear and consistent messages coming down from the ranks of management:

The importance of establishing the correct culture and environment [to enable the] reporting of [health and safety] concerns by employees cannot be over emphasised. Sadly, this has not yet been fully established in the Company. There are also variations in management response to any such issue raised and this does little to engender trust and respect.

Another health and safety manager, from a medium-sized health sector organisation, felt very unhappy at the way health and safety appeared to be marginalised:

...staff tend to either report directly to HSE, their union rep or myself, but often I am the last to find out about a problem...I have passed my exams and gained my diploma in safety management...but I do not feel it will be of value [here], as I am only used as a management tool as and when required, only my immediate superior and...staff who I work with communicate adequately on such matters.

3.3 General comments around the issue of employee reporting
When invited to comment generally on their experiences, respondents volunteered much useful information, both in relation to the problems they had encountered when
communicating health and safety issues down through middle management and receiving information from employees, and other relevant matters.

3.3.1 Fine words are not enough...
As noted above, several respondents emphasised the importance of sending the right signals to employees about reporting health and safety concerns. Consistency between words and actions is of particular importance - if you say one thing but do another then the workforce may well be reticent about reporting problems.

The manager from the health sector quoted above commented that “all employees have had mail drops in their pay slips informing them of their rights and responsibilities, so there is no real reason for any failure of response”. But he also remarked that “some staff are deliberately discouraged from reporting [health and safety] issues and incidents by managers who think they know better”. The communication problems in this organisation could be at least in part attributable to the varied attitude of managers towards health and safety.

3.3.2 The importance of feedback
This has been noted above. A respondent from the printing industry (medium) described the lengths to which his company had gone to ensure that health and safety issues were accorded a high priority:

We have...introduced a procedure whereby all ‘reportable accidents’ under [the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations] are reviewed by the health and safety committee and the senior managers. This is not to ‘blame’ but to raise the awareness of senior managers to the number of serious accidents on site and to ensure that they are satisfied that sufficient action is taken to minimise the risk of similar accidents. Accident stats are published works wide.

Feedback in this context was seen as part of a learning process, where previous accidents were analysed to see what went wrong before and if it could be prevented from happening again. Other respondents suggested that near-miss reporting forms might be used for a similar purpose.

3.3.3 Sector-specific issues
Some cultural issues working against proactive health and safety practices may have their roots in prevailing attitudes in particular industries and sectors. Those working in construction - a sector with one of the highest rates for fatal and major accidents in the UK⁹ - should place great importance on health and safety. However, the experience of one respondent from a medium-sized company in this sector suggested that the opposite might be true in some cases:

Management throughout construction shows little change in their attitudes. Despite [the Construction (Design and Management) Regulations], management programmes etc. there is little change and certainly little respect for the operatives. Yet they make the biggest impact on any contract in terms of quality, safety and overall attitude.

In this context it is worth noting that under reg. 18 of the Construction (Design and Management) Regulations 1994 the principal contractor on every construction site must:

“(a) ensure that employees and self-employed persons at work on the construction site are able to discuss, and offer advice to him on, matters connected with the project which it can reasonably be foreseen will affect their health and safety; and
(b) ensure that there are arrangements for the co-ordination of the views of employees at work on construction work, or of their representatives, where necessary for reasons of health and safety...". 10

3.3.4 Problems with seniority

Comments from some respondents suggest that differing attitudes between senior and junior employees may be a potential source of communication problems. One manager (Health, medium) said that in his experience “the more senior people seldom seek advice and are more of a problem. Younger members of staff are more aware of safety issues and more willing to question procedures and to seek guidance.”

In organisations where a Health and Safety Advisor system was in place the perceived seniority of this individual was felt in a few cases to have some bearing on the willingness of employees to approach him or her with concerns. A health and safety manager from the waste sector (medium) said that “although the Health, Safety and Environmental Advisor is independent of line management his seniority (reporting at board level) can be off-putting to very many junior staff.”

3.3.5 Labour market trends

Changing patterns of work - including the increasing trend towards self-employment and short-term contracts - coupled with perceptions of job insecurity for other employees, might have some bearing on the willingness of employees to report health and safety concerns. This accords with the experience of one health sector manager (medium), who said that the introduction of short-term contracts in his organisation had lead to “high staff turnover” and presented “a continual challenge” to health and safety, particularly in view of the “poor communication channels”.

3.4 The relevance of these issues to small organisations

One of the main purposes of this survey was to elicit views and experiences from managing directors of small companies on the issue of employee reporting of health and safety concerns. 44% of the UK’s private sector workforce is employed in organisations with less than 50 employees, and the proportion is growing. 11 We were interested to see whether managers of small organisations perceived any communication difficulties within their enterprises.

On the whole, the answer to this question was a resounding “no”. Only a quarter of respondents from small organisations agreed that their employees had in the past felt inhibited about reporting health and safety concerns, compared to nearly three-quarters of medium and large organisations. Only one respondent from a small organisation indicated that employees in his organisation may not have reported concerns in the past because they had felt uncertain of the manager’s response.

Respondents from small organisations did indicate that employees reported their concerns in a variety of ways: more than half said that they did so with someone in management other than their line manager, three said they used trade unions and five mentioned health and safety representatives/committees. One said that a report form was used.

When asked about procedures and mechanisms for reporting concerns, most respondents from small organisations remarked that the size of their enterprise meant that formal communication procedures were not warranted and that managers were constantly in touch with their workforce and with the work itself, and accordingly were aware of any problems.
One managing director (Mechanical engineering) remarked:

We are a very small company and communication within it is not specifically structured, so anyone can approach the managing director on any matter.

Another (Leisure) commented:

We are a very small concern and the directors personally work with all staff.

Two respondents from small companies (Leisure and Food) said that some procedures used by larger organisations were “too formal” and “too complicated” for their size of undertaking.

There was a suggestion that the fact that the senior manager was almost always present did not necessarily mean that employees would report concerns. This view was expressed by a respondent from a small health sector organisation:

Our staff are very committed to health and safety and report any problem that arises to either myself or the senior nurse. However, I think that all staff need reminding about the issues but as this is a small unit and the management team are always here we monitor the situation constantly.

As this comment shows, the fact that senior management are present means that they are well placed to see whether employees are not reporting health and safety problems and if so to encourage and remind them to do so.

In the light of these comments it was not surprising that only three respondents from small organisations said that there was a procedure for employees to report their concerns about health and safety to someone other than their line manager. An unexpected finding was that a further seven respondents from small organisations said that they were considering whether to introduce such a procedure.
4.0 Conclusions

Above all, respondents have emphasised the importance of communication - through as many means as are thought suitable or whichever are found to work - in promoting the messages that health and safety is everybody’s business; employees are expected to play their part.

Most respondents also thought it important that their employees should receive an assurance that they will not suffer in any way for reporting health and safety concerns. A significant number felt that a key element of good practice - particularly in terms of establishing an open culture where employees are encouraged to report concerns - is that managers take and are seen to take action when concerns are reported and employees get feedback on the results of any investigation/action.

When it comes to the manner of communicating these messages, the survey results show that training and induction are regarded by respondents as the most effective means of communicating with their workforces about health and safety. As regards the reporting of concerns by employees, most respondents affirmed the role of health and safety representatives and committees as an important route through which employees channel their concerns. This is of particular relevance given the requirements under the Health and Safety (Consultation with Employees) Regulations, in force since the end of October 1996, that all employers (regardless of size and irrespective of union recognition) consult with and provide information to employee representatives about health and safety.

4.1 Further research

What this survey has shown is that the issue of employee reporting does hold considerable interest for this group of respondents. The survey results, and the comments of respondents in particular, have highlighted the value of follow-up work on these issues. An important aspect of such work would be to gauge the views and experiences of employees themselves in order to report upon the issue from their perspective - which is after all the most important perspective in this context. Follow up work would also include an examination of the human factor element in health and safety reporting from the perspective of personnel and other managers.

Such follow-up work might include the following topics:

- what is the relative importance - according to organisational size - placed on employee reporting as a means by which organisations learn of risks to health and safety?
- what factors are likely to influence employees in small organisations in deciding whether to report concerns about health and safety, and are these factors any different from those that apply to employees in medium and large-sized enterprises?
- what effect do short-term contracts and other forms of atypical work have on the willingness of employees to report health and safety concerns?
- what effect do mechanisms such as messages on wages slips, financial and non-financial incentives have on the willingness of employees to report health and safety concerns?
- do assurances against adverse repercussions have any effect on the willingness of employees to report health and safety concerns?
• do express contractual obligations have any effect on the willingness of employees to report health and safety concerns?
• are employees aware of their statutory duty to report health and safety concerns and their statutory protection against victimisation and unfair dismissal, and if so, does this have any impact on their willingness to report health and safety concerns?
• does the existence of a procedure outside line management have any impact on the willingness of employees to report health and safety concerns, and if so, is the question of identity a significant factor?
5.0. Methodology

5.1 Sample Size
In December 1996 Public Concern at Work sent unsolicited questionnaires to Health and Safety managers or Chief Executives of 225 organisations selected from the 15 sectors (listed overleaf). The sectors were chosen to reflect a spread of perceived risk to health and safety - ranging from very high in construction and mining to low in retailing.

5.2 Organisations surveyed
In order to gain a cross-section of views from organisations of different sizes, we selected from each sector five small, five medium and five large organisations. For the purposes of this survey ‘small’ organisations were classified as those with less than 50 employees (following the classification used by the HSC in its recently concluded consultation with small businesses), ‘medium’ were those with between 50 and 1000 employees, and ‘large’ were those organisations with more than 1000 employees. In order to obtain the right mix of organisations from each sector the survey sample was selected using the Health and Safety Managers’ Yearbook and Dun & Bradstreet Regional Business Directories.

With the exception of 10 NHS bodies, all organisations surveyed were private sector companies.

5.3 Response Rate
After two reminders, 94 completed questionnaires were returned, giving a response rate of 42%. 13 organisations returned uncompleted questionnaires, with some citing company policies of not responding to unsolicited surveys.

5.4 Survey Feedback
The survey itself enjoyed positive feedback from respondents:

I think the survey is an excellent idea. If at the end only one accident is prevented it was worthwhile.

This survey was useful in crystallising our ideas as well as contributing to a national overview.

Consistent with this, nearly two-thirds of the respondents indicated they would be willing to assist in follow-up research.
6.0 Organisational Profiles

6.1 Who Responded?
We received responses from Construction (9), Food and beverages (2), Health (9), Leisure (8), Mechanical engineering (5), Metal working and manufacturing (5), Mining (5), Petrochemicals (6), Pharmaceuticals (7), Power (5), Printing (3), Retail (3), Textiles and clothing (8), Transport (9) and Waste & Recycling (9). One respondent chose to remain anonymous. With the exception of six NHS bodies, all organisations which responded were from the private sector.

6.2 Size
38% of these responses were from large organisations, 35% were from medium and 26% from small organisations.12

6.3 Levels of risk among respondents
Respondents were asked to rate the level of risk to health and safety in their sector, with five options given: very high, quite high, moderate, low, quite low and very low.

- 15% of respondents rated the risks in their sector as very high;
- 32% of respondents rated risks as quite high;
- 31% rated risks as moderate;
- 17% rated risks as quite low, and
- 5% rated risks as very low.

Contrary to our expectations, there was no meaningful association between the stated level of risk and answers to other questions in the survey.
7.0 How do organisations learn of risks to health and safety?

The questionnaire asked respondents to state how they learn of risks to health and safety. The most common sources of information, used by over 90% of respondents were concerns raised by employees, publications or reports from external bodies and in-house workplace safety assessments. Over 80% of respondents said that they gained information from investigations after near-misses and accidents.

Respondents were invited to state whether they learnt of risks to health and safety from means other than the five options listed, and if so, to specify what the other means were. These included:

- "Hasnet’ link by Email to other University Safety Officers" (Health, medium);
- "NHS circulates ‘Hazard warning notices’ to all health trusts" (Health, medium);
- “Reports from other company plants” (Metal working, medium).
- “Networking with other local employers at HS meetings” (Transport, medium);
- “Team Briefings and ‘Toolbox’ sessions” (Waste & recycling, large);

7.1 What are the most important sources of information about risks to health and safety?

Respondents were also asked to rank the five options provided in order of importance. In terms of ranking options as “very important”, the results were as follows:

- 85% of respondents stated that in-house workplace safety assessments were a very important means of learning of risks to health and safety;
- 48% said that concerns raised by or through employees were very important;
- 36% said that publications/reports from external bodies were very important;
- 31% said that investigations after accidents were very important; and
- 29% said that investigations after near-misses were very important.

7.2 Observations

7.2.1 Health and Safety at Work Regulations

It is now more than four years since the Management of Health and Safety at Work Regulations 1992 came into force, placing every employer under a duty to make a “suitable and sufficient assessment of risks to health and safety of his employees [and] ...of persons not in his employment”. The findings reported above tend to indicate that most employers are aware of this obligation and acknowledge the value of risk assessments.

The five respondents who stated that their organisation did not learn of risks to health and safety via risk assessments all rated the risks to health and safety in their sector as moderate to very low. Four out of the five were small organisations, with the other being medium-sized (800 employees). One respondent (Textiles, Small) stated that their organisation did not learn of risks to health and safety from any of the options provided - indeed, this respondent commented that most of the questions in the survey were ‘not relevant’. The other four respondents in this group all said that concerns reported by or through employees were the most important means by which their organisation learnt of risks to health and safety.
7.2.2 Concerns raised by employees
Concerns reported by or through employees were ranked as “very important” by nearly half of all respondents - significantly more than the proportion who ranked investigations after accidents or near misses as very important sources of information about risks to health and safety. Employers from organisations of all sizes and from all sectors recognise their employees as an important means of minimising their risks to health and safety.
8.0 How do employees communicate their concerns about risks to health and safety?

Respondents were asked how employees in their own organisation reported concerns about risks to health and safety.

- 77% of respondents said that concerns were raised via line management;
- 74% cited safety representatives or committees;
- 72% cited someone in management other than their line manager;
- 60% cited near-miss or accident report forms;
- 45% cited trades unions, and
- 23% cited telephone links.

8.1 Which routes are the most frequently used by employees?

Respondents were also asked to rank their answer in terms of how frequently each of the routes were used by employees.

- 75% of respondents said that employees most often raised their concerns with their immediate line manager;
- 43% cited the safety representative or committee as a very frequent route;
- 32% cited someone in management other than their line manager;
- 18% cited near-miss or accident report forms;
- 11% cited trades unions as a very frequent route;
- 4% cited telephone hotlines;

8.2 Reporting concerns via immediate line management

The most common route for the raising of health and safety concerns by employees was via their immediate line manager. However, in the opinion of one respondent a disadvantage of this route was that “it relies on the employee being persistent and using correct procedure and keeping faith in the immediate line manager who occasionally forgets.”

8.3 Reporting concerns via safety representatives or committees

The survey results showed that, in this particular sample, safety representatives and committees were predominantly used in medium and large organisations.

One respondent (Metal working, medium) stated that safety representatives were used in conjunction with line management to ensure that the issue was being addressed:

We encourage employees to initially voice matters on health and safety with their immediate supervisor then to reinforce this by advising their safety rep. Should the above fail to gain a positive response then they are told to report direct to the site health and safety manager.

Other respondents mentioned that their organisations were using or implementing a system of nominated employee safety advisors. One (Metal working, medium - not the same as the above respondent) said that their organisation’s safety advisor system, which was complemented by extensive staff training, had made a significant difference. The increased safety awareness that this had brought about led to fewer concerns being raised:

The biggest impact of safety advisors has been the reduction in the number of problems passed on. More and more employees are solving the problems themselves.
As a mark of the scheme’s success this organisation was planning to double the number of trained employee safety advisors next year and then to ensure that all line managers were trained to the same level.

Another respondent (Health, medium), whose organisation had a policy whereby all departmental Heads were required to appoint a “Departmental Safety Advisor to guide staff in safe working practices and to control risk”, emphasised the importance of taking the job seriously, but noted that some took it more seriously than others:

As the role is unpaid and often seen as an addition to ‘normal’ duties, some are more willing and conscientious than others, perhaps reflecting the departmental Head’s expectations.

8.4 Reporting concerns through near-miss or incident report forms
Near-miss or incident report forms were stated to be a frequently used route for the reporting of health and safety concerns by employees only in medium and large organisations.

A few respondents whose organisations found that their employees used report forms with varying degrees of frequency expressed views on their use. One health and safety manager (Health, large) in an organisation where report forms were not the most frequent means by which employees reported concerns noted that:

I sometimes get forms sent to me before the employee has approached their manager and on the majority of occasions the problems are solved when they do.

This manager noted that there were difficulties with the type of incident report form used by his organisation:

It is a form and many employees are reluctant or cannot be bothered to complete it unless they are extremely aggrieved.

This could be attributable to the fact that the form requires employees to identify themselves, a factor which the manager said led to it being used more often by trade union representatives than ordinary members of staff. This is dealt with below (see ‘Procedures’, section [12.0]). The manager concluded by noting that his organisation had recently appointed a risk management advisor with whom the manager proposed to carry out a review of the existing reporting procedure.

Another health and safety manager (Health, large) commented upon the importance of management taking action - and being seen to take action - when employees made reports:

Safety visits in response to employee reports and accident form follow ups presently form the basis for spreading the word that we are interested and will act.

A Managing Director from a small transport company explained his firm’s health and safety reporting policy:

Drivers are required to fill in reports for any defects / occurrences which are then followed up by engineers or management, this usually covers most eventualities. Staff are encouraged to voice concerns to managers etc. on any subject.

8.5 Trades unions
Although only 11% of respondents said that unions were used “very frequently” by their employees to report concerns about health and safety, this should be balanced against the
finding that 43% of respondents stated that health and safety representatives and/or committees were used very frequently for this purpose. Such representatives will often (though not always) be a trade union member.\textsuperscript{16}

However, one respondent (Transport, medium) commented:

I feel employees should be discouraged from raising health and safety issues through trades union representatives as this can effect an ‘adversarial’ atmosphere. It is far better to have an entirely open policy where issues can be raised and discussed with or by anyone in the organisation as soon as a problem is identified, as long as the information reaches the Health and Safety Officer at some stage.

8.6 Observations
It is not at all surprising that most respondents identified ‘immediate line manager’ as the most frequently used route for employees to report concerns about health and safety. Many of these organisations were not content to rely purely on this reporting system and were reviewing their procedures to see if improvements could be made. Reporting concerns to someone in management other than the immediate line manager also featured prominently, with 30 respondents stating that employees in their organisation reported concerns about health and safety through this route very frequently. Of those respondents who stated that employees in their organisations reported health and safety concerns via health and safety representatives and/or committees, a majority stated that these avenues were used ‘very frequently’.

These two findings tend to lend support for the central position occupied by health and safety representatives and committees in the present legislative framework - recently reinforced by European law and the Health and Safety (Consultation with Employees) Regulations 1996.

By way of contrast, experience as to the use of near-miss or incident report forms was much more varied. While 56 respondents said that employees in their organisations used such forms to report health and safety concerns, only 19 respondents said that they did so very frequently. The use of telephone hotlines was even more mixed, with 22 respondents saying employees did report concerns in this way but only four saying that they used this route very frequently. The reasons why employees may or may not feel comfortable in using near-miss reporting schemes and telephone hotlines is an issue that deserves further exploration in qualitative field work.

The fact that a particular reporting system is not used frequently does not necessarily mean that it is not of value. Its very existence may provide the reassurance employees need to raise the matter openly through the usual routes.

Generally speaking, the larger the organisation, the more options were provided for employees to report concerns.
9.0 How do organisations encourage employees to raise concerns about risks to health and safety?

The questionnaire asked respondents how their organisations encourage employees to report concerns about health and safety.

The results showed that the most common methods used by organisations in this sample to encourage employees to report their health and safety concerns are induction and training:

- 85% used induction and training;
- 83% encouraged reporting via health and safety policies;
- 81% used employee meetings to encourage employees to raise their concerns;
- 66% of respondents said that their organisation used posters;
- 62% of respondents used newsletters and employee handbooks;
- 25% of respondents said they used messages on wages slips;
- 20% of respondents used non-financial incentives, and
- 11% of respondents used financial incentives.

<table>
<thead>
<tr>
<th>Means/Organisation size</th>
<th>Small (n=24)</th>
<th>Medium (n=33)</th>
<th>Large (n=36)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Messages on wage slips</td>
<td>2</td>
<td>12</td>
<td>7</td>
</tr>
<tr>
<td>Financial incentives</td>
<td>2</td>
<td>6</td>
<td>11</td>
</tr>
<tr>
<td>Other incentives</td>
<td>6</td>
<td>6</td>
<td>11</td>
</tr>
<tr>
<td>HS Policy</td>
<td>16</td>
<td>29</td>
<td>31</td>
</tr>
<tr>
<td>Posters</td>
<td>13</td>
<td>23</td>
<td>26</td>
</tr>
<tr>
<td>Newsletters/Handbooks</td>
<td>6</td>
<td>27</td>
<td>24</td>
</tr>
<tr>
<td>Induction</td>
<td>13</td>
<td>31</td>
<td>36</td>
</tr>
<tr>
<td>Training</td>
<td>19</td>
<td>28</td>
<td>35</td>
</tr>
<tr>
<td>Employee meetings</td>
<td>15</td>
<td>29</td>
<td>29</td>
</tr>
</tbody>
</table>

Means used to encourage employees to report health and safety concerns by reference to organisation size

Only three respondents mentioned that they used methods other than the options listed to encourage employees to report concerns about health and safety. One health and safety manager (Construction, large) said that his organisation used “face to face encouragement during safety inspections [and] informal contact between line manager and employees”. Another (Construction, large) mentioned “toolbox talks [and] videos”, while the third (Transport, medium) stated that his organisation encouraged employee to report concerns through “random visits by health and safety officer to sites”.

9.1 How effective are these options?

Respondents were asked to rank each of the options used by their organisation according to their relative effectiveness in achieving the desired result, namely, to ensure that employees did voice concerns about health and safety. The results showed that the most effective means for this sample are training and induction, with over half of all respondents ranking both as “very effective” means of encouraging employees to report concerns about health and safety. 40% of respondents said they found a health and safety policy to be very effective for this purpose, and a further 35% of respondents rated employee meetings as very effective. The
other five options were ranked in terms of whether they were a very effective method as follows:

- 21% of respondents said that newsletters/handbooks were very effective methods for encouraging employees to report concerns about health and safety;
- 16% of respondents stated that posters were very effective;
- 7% of respondents said messages on wage slips were very effective;
- 5% of respondents said they found non-financial incentives to be very effective; and
- 2% of respondents identified financial incentives as very effective.

Several respondents provided comments on the use and effectiveness of a number of these methods, and these are discussed below.

9.1.1 Health and safety policies
Some respondents indicated that they had experienced difficulties in translating these policies from theory into practice. In particular, a number said that procedures alone were inadequate if not backed up by managers reinforcing the message through taking appropriate action when concerns were reported. This is discussed in more detail below when specific reporting procedures are considered.

One manager (Waste, small) questioned the wisdom of relying solely on written procedures to get the message across to the workforce:

> Written procedures are no good when dealing with men on the ground. Neatly bound books etc. convey only lip-service to the matter, and the employees, although having to sign and say they’ve read it, do not actually take it in, and that’s if they have read it!

This respondent felt that face to face discussions were more effective:

> Face to face regular discussions with individual employees telling them in a frank and honest way that health and safety is in their and their family’s interest.

9.1.2 Incentive schemes
11% of respondents said that their organisations used financial inducements to encourage employees to report health and safety concerns. However, only two viewed them as “very effective”. 20% of respondents said that their organisations used non-financial incentives, with only four finding them “very effective”. The organisations that used incentives (whether financial or not) tended to be in high risk sectors. The two respondents who said that financial incentives were very effective came from organisations in very high risk sectors - Mining (medium) and Construction (large).

One respondent (Petrochemicals, medium) whose organisation operated a non-financial incentive scheme described it as follows:

> We do not operate an incentive scheme for monetary gain. Instead the company operates a scheme which gives the opportunity for employees to participate in charitable causes. Safety targets are set annually and a sum of money is committed per employee...We do not believe that any employee should be paid to work safely, it is their duty to.

This respondent indicated that the incentive scheme was not a particularly effective means of encouraging employees to report concerns; in his judgement a health and safety policy, induction and training were the three most effective methods.
9.2 Observations

9.2.1 On means of encouragement
The small organisations surveyed do not use induction and training as often as larger organisations in order to encourage their workforce to report health and safety concerns. However, these are the two methods cited by the majority of respondents as the most effective means of encouraging employees to report health and safety concerns (see below). Newsletters and handbooks tend to be less utilised in small organisations. Also of interest is the relatively widespread use of “other incentives” by organisations of all sizes. It is notable that “financial incentives” can be negative as well as positive; anecdotal evidence suggests that there do exist practices of penalising employees where accidents occur resulting in lost time and/or production. The results showed that organisations operating in higher risk sectors tended to use a wider variety of means to encourage their employees to report health and safety concerns.

9.2.2 On effectiveness
While larger organisations operating in higher risk sectors tended to use a variety of different means to encourage their employees to report health and safety concerns, these approaches (e.g. messages on wage slips, financial and non-financial incentives) are generally not regarded as being as effective as the more traditional methods of induction, training and health and safety policies. Several respondents noted that in order to be truly effective the traditional methods needed to be reinforced through face to face communication and feedback on action taken. The following comment from a health and safety manager (Textiles, large) is typical of this sort of approach:

Employees, individually and through their unit health and safety committees are encouraged to raise any concerns that they have. All are investigated openly and results fed back to the employees at the base unit and circulated to all other units when risk assessments are conducted in their area. We believe that openness, consultation and notification are of prime importance.

Another (Food, large) said:

We also have many informal routes - part of the organisation’s culture is free, open and easy communication. That culture promotes the sharing of problems.
10.0 Obstacles to reporting concerns

The questionnaire asked respondents to indicate possible reasons why employees generally might not report concerns about risks to health and safety. All but four respondents identified at least one reason why employees might not report health and safety concerns, and most respondents identified several reasons.

- 86% of respondents stated employees did not report health and safety concerns because they thought it was someone else’s job;
- 81% stated employees did not report concerns because they did not recognise the risk;
- 76% stated that employees did not report concerns because they could not be bothered;
- 67% stated employees did not report concerns because they did not know that they should;
- 67% stated employees did not report concerns because they were uncertain of their manager’s response; and
- 54% stated employees might be deterred through uncertainty of their colleagues’ reaction.

Only one reason apart from those listed was named (by a manager from Waste, medium) as a factor inhibiting the reporting of health and safety concerns by employees. This was “pressure of work - not enough time”.

10.1 What are the most significant obstacles to reporting concerns?

Respondents were asked to rank each of the reasons they identified in terms of relative significance. The results were as follows:

- 52% of respondents said do not recognise the risk was a very significant reason;
- 48% said think it’s someone else’s job was very significant;
- 46% said can’t be bothered was very significant;
- 19% said that uncertainty of manager’s response was very significant;
- 15% said that a very significant reason for employees not reporting was that they do not know that they should; and
- 4% said uncertainty of colleagues’ reaction was very significant.

10.2 Obstacles to reporting concerns: Past experience

Respondents were then asked whether any of the factors listed above had in the past inhibited employees in their own organisation from reporting concerns about risks to health and safety. 61% of respondents said that one or more of these factors had inhibited the reporting of concerns by employees. Most of these respondents came from medium or large sized organisations, as the table below illustrates:
<table>
<thead>
<tr>
<th></th>
<th>Small (n=24)</th>
<th>Medium (n=33)</th>
<th>Large (n=36)</th>
</tr>
</thead>
<tbody>
<tr>
<td>The factors listed have in the past inhibited employees in my organisation from reporting concerns about health and safety</td>
<td>6 (25%)</td>
<td>25 (78%)</td>
<td>25 (69%)</td>
</tr>
</tbody>
</table>

(Anonymous=1)

Employees in own organisation have been inhibited from reporting health and safety concerns by reference to organisation size

When the 57 respondents were asked to relate the various options specifically to employees in their own organisations, the results were as follows:

- 43 respondents said that employees had been inhibited from reporting health and safety concerns because they **thought it was someone else’s job**;
- 38 felt that their employees had been inhibited because they **did not recognise the risk**;
- 33 identified **can’t be bothered** as a factor;
- 24 mentioned **don’t know that they should**;
- 22 said that employees in their organisation had been inhibited from reporting concerns because they were **uncertain of the manager’s response**, and
- 13 mentioned **uncertain of colleagues’ reaction**.

10.3 Remedial action

Respondents who indicated that employees in their organisation had in the past been inhibited from reporting concerns about health and safety for one or more of the reasons listed above were asked whether they had taken any action as a result. Not surprisingly, all 57 respondents in this group said that they had taken action. The questionnaire then asked respondents to specify what action they had taken. 48 respondents answered this part of the question, and the action taken was as follows:

- 25 undertook specific **training or retraining programmes**, or a combination of talks, training, risk assessments and awareness campaigns - including one who introduced a system of “safety awards for proactive thinking”;
- 11 embarked on a **safety campaign**, without retraining, to initiate a ‘no-blame culture’ and to raise awareness;
- 10 said they engaged in discussions with the workforce about the issue. Three of these specifically mentioned **toolbox talks**, and two others said that they introduced a **health and safety committee**; and
- 2 said that they **warned employees to report** matters: one of these distributed **written warnings** under the company’s disciplinary procedure.
A number of respondents provided further details on the communication strategies which they employed. The following are a selection of interesting comments:

Health, large:
Give instruction to all new staff at their induction, remind managerial staff of their duty to ensure the health and safety of their staff and the necessity for risk assessment.

Petrochemicals, medium:
More & repeated training to request hazard reports, safety awards for proactive thinking and regular advisory safety bulletins on notice boards to encourage hazards spotting.

Construction, large:
Constantly instructing operatives at site inductions to report faults/problems. This is reinforced by tool-box talks and encouraging operatives to a ‘near miss’ mentality.

Health, medium:
If a risk factor or potential problem cause was discovered and not reported, I would bring it to the attention of all concerned and ask why it was not reported promptly. [Then] I would have it dealt with and explain to staff their duty of care should a similar situation occur again.

Waste, medium:
Raised profile of reporting H&S issues. Attempt to remove ‘blame’ culture and provide sufficient time to consider/administer h&s issues.

Printing, medium:
Conducted HS awareness training, showed videos to employees, conducted risks assessments, highlighted near misses/dangerous occurrences.

Health, medium:
These issues were discussed at the HS meetings, and managers were informed to ensure that they and their staff are aware of their responsibilities.

Waste, medium:
Employees negligently failing to report risks are interviewed by the health and safety advisor. Where employees are concerned about superiors or colleagues reactions they are advised to contact the HSE advisor directly who will deal with the matter in confidence.

Waste, small:
Informed personnel that they must report health and safety matters. A grieving wife will not thank you for your can’t be bothered attitude.

These respondents were then asked to evaluate the relative success or failure of the action they had taken. Of the 57 who answered this question, 12 said that their action had been “very successful”, while 36 said the action had been “quite successful”. Both respondents who said that their organisations had issued warnings to report described this action as “very successful”.
10.4 Observations
The overwhelming majority of respondents felt that employees generally may not report concerns about health and safety, either because of apathy (“can’t be bothered”), lack of awareness (“do not recognise the risk”, “don’t know that they should” and “think it’s someone else’s job”) or fear (“uncertain of manager’s response”/“uncertain of colleague’s reaction”). In terms of relative significance, lack of awareness and apathy feature much more prominently than fear, by a ratio of more than two to one.

In relation to respondents’ own organisations, over half acknowledged that one or more of the factors listed had in the past inhibited the reporting of health and safety concerns by employees. Once again, the most common factors identified were those concerning lack of awareness and apathy. Fear - particularly of manager’s response - featured more strongly in this part of the question, with nearly 40% of respondents identifying it as a relevant factor in their own organisation as opposed to 20% who thought it generally very significant.

The responses given concerning the factors which had inhibited the reporting of concerns accorded with the action taken to address the situation. Most respondents addressed apathy and lack of awareness through training and awareness campaigns. The importance of informal communication and face to face talks as an effective way of getting the message across was emphasised by several respondents in comments. The issue of fear was acknowledged by many respondents who stated that they had taken steps to introduce a ‘no-blame’ culture into the workplace.

The fact that a much lower proportion of small organisations felt that their employees had been inhibited from reporting concerns than medium or large undertakings is noteworthy. The reasons for this are unclear and in the absence of more extensive data it is difficult to speculate as to possible causes: it may be, for instance, that because communication structures in small organisations are ‘flatter’ there is less opportunity for health and safety issues to become lost in the line management hierarchy. It is also likely that managers in small organisations may be closer to the shop floor and so more likely to identify any problems as they arise and take remedial action immediately.

It should also be remembered that these results are managers’ perceptions of what they believe to be obstacles faced by employees in reporting health and safety concerns. A survey of employees on the same subject would produce valuable complementary data.
11.0 Contractual Requirements and Assurances

Respondents were asked whether their employees were contractually required to report concerns about health and safety. 47 respondents answered in the affirmative. 33 of those organisations had also stated that their employees had been inhibited in the past from reporting health and safety concerns, with 25 identifying the option “Think it’s someone else’s job” as the most common inhibiting factor.

11.1 How successful are contractual requirements?

Of the 47 who had contractual requirements 34 said that this method was either “very successful” or “quite successful”. Nine respondents said that the use of a specific contractual requirement was “unsuccessful”.

11.2 Assurances against repercussions

The questionnaire asked whether organisations gave their employees an assurance that they would be protected from possible adverse repercussions (whether from management, colleagues, or both) as a result of reporting a concern about health and safety.

87 respondents answered this question, with 54 stating that they did provide such assurance. Those who answered ‘yes’ were then asked to state what form that assurance took. 11 respondents said that they gave their employees both verbal and written assurances, including (for example) a “well-publicised policy statement from the Chairman”. Another 11 said that the assurance was only a verbal one given, for example, in group meetings with employees. Four respondents stated that their assurance was in written form only, such as in employee handbooks. 8 organisations expressly mentioned a ‘no blame’ policy, with one (Waste, medium) indicating an option to contact an HSE advisor in confidence if necessary. A further 20 respondents said that their organisations provided assurances through various means such as induction, meetings and informal talks with employees.

A number of respondents elaborated on their answers. A few of the more interesting comments reproduced below.

Metal working, medium:

Near miss documentation states ‘no blame’. Accident investigation carried out on basis of fact finding not blame apportionment.

Health, medium:

It is very dependent on the manager, unfortunately there is a stronger blame culture than a no-blame culture, again this is highlighted by the HSE visit in ‘96.

Leisure, large:

Staff can report direct to the health and safety officer who will not give out name of person plus ... [there is] a system in place where employees do not have to put name on report.”
Petrochemicals, large:
Formally encouraged by line management to report concerns through hazard and near
miss reporting systems as part of continuous assessment of employee contribution.

Textiles, large:
It has been a condition of employment that concerns are reported for 3-5 years. Once
employees have seen and been involved in actions necessary, they now have
confidence in the system.

11.3 What effect did these assurances have?
The 54 respondents whose organisations did provide assurances against adverse
repercussions were asked what effect these assurances had on willingness of employees to
report concerns about health and safety. 39 respondents said that the effect of the assurance
had been positive. Significantly, none of the respondents said that there had been a negative
effect. 15 stated that they were unable to say whether the assurance had had any effect on the
willingness of employees to report health and safety concerns.

11.4 Observations

11.4.1 Contractual requirements
Despite the fact that employees are under a statutory duty to draw to their employer’s
attention any shortcomings in the health and safety regime, a number of organisations have
still felt it necessary to insert an express contractual obligation to reinforce this duty. This is
perhaps not surprising in light of the widespread view that employees do not report concerns
about health and safety either because of apathy or lack of awareness of their responsibility to
do so. The use of express clauses also tends to reflect an acknowledgement on the part of
managers that many employees will not be aware of their statutory duty to report health and
safety concerns. This could be a matter that might usefully be explored in qualitative follow-
up work.

11.4.2 Assurances
A majority of respondents (57%) state that their organisations do provide assurances, in one
form or another, to their employees against possible adverse repercussions resulting from the
reporting of health and safety concerns. This figure of itself tends to suggest that managers
do recognise an unwillingness on the part of employees to report health and safety concerns
due to a certain type of fear, whether of victimisation, or being branded a troublemaker, or
harassment in some other way. Respondents indicate that assurances do generally have a
positive effect.

It is worth noting that employees have had, since 1993, significant employment protection
rights against victimisation and unfair dismissal for bringing to their employers’ attention, by
reasonable means, circumstances connected with their work which they reasonably believe to
be dangerous to health and safety (see Appendix A). It is not known what effect, if any, the
existence of this protection has had on the willingness of employees to report health and
safety concerns. This is a matter that could usefully be explored in follow-up work or other
research. Equally it would be important to ask employees whether the assurances provided
to them by their employers did indeed have the positive effect claimed by the respondents to
this survey.
12.0 Specific procedures for employees raising concerns about risks to health and safety outside of line management

Respondents were asked whether their organisation operated a procedure which “gives employees the option to report health and safety concerns with someone other than their immediate line manager”. 53 respondents said that their organisations did have such a procedure. A further eight respondents said that their organisations were considering whether to establish such a procedure. Three respondents said that they considered establishing such a procedure but did not do so, and 21 respondents said that they did not have such a procedure and never considered establishing one. Nine respondents did not answer the question. Over half of those with procedures stated that they are used either frequently or regularly, and a majority said that the availability of the procedure had resulted in a moderate or high improvement in health and safety performance in their organisation.

A breakdown of those organisations with procedures by reference to size shows that it is predominantly medium and large organisations that are currently using procedures. It is noteworthy, however, that more than a quarter of respondents from small organisations said that they were considering whether to establish such a procedure.

<table>
<thead>
<tr>
<th>Statement/size</th>
<th>Small n=24</th>
<th>Medium n=33</th>
<th>Large n=36</th>
</tr>
</thead>
<tbody>
<tr>
<td>No procedure</td>
<td>9</td>
<td>6</td>
<td>6</td>
</tr>
<tr>
<td>Considered establishing procedure but did not do so</td>
<td>2</td>
<td>1</td>
<td>0</td>
</tr>
<tr>
<td>Currently using procedure</td>
<td>3</td>
<td>26</td>
<td>24</td>
</tr>
<tr>
<td>Considering whether to establish in future</td>
<td>7</td>
<td>0</td>
<td>1</td>
</tr>
<tr>
<td>No response</td>
<td>3</td>
<td>0</td>
<td>5</td>
</tr>
</tbody>
</table>

Existence of procedures by reference to organisation size

12.1 How long has the procedure been in operation?
Respondents were asked how long the procedure had been in operation. The results are set out in the table below:

<table>
<thead>
<tr>
<th>Less than 1 year</th>
<th>Less than 2 years</th>
<th>Between 2 and 5 years</th>
<th>Between 5 and 10 years</th>
<th>More than 10 years</th>
</tr>
</thead>
<tbody>
<tr>
<td>6</td>
<td>5</td>
<td>13</td>
<td>8</td>
<td>8</td>
</tr>
</tbody>
</table>

Length of time procedure has been in operation (N=40)

13 organisations declined to comment or stated that they did not know.

12.2 What were the reasons for establishing this procedure?
Respondents were asked why their organisation had established such a procedure. The main reasons given were as follows:

- 11 respondents said that their organisation had introduced the procedure as an example of good business or management practice;
• 6 respondents said that their organisation instituted the procedure as a result of legislation or legal requirements;

• 5 respondents said that their procedures were established to improve employee participation in the health and safety process. One (Mechanical engineering, medium) stated that it was "to improve ownership of health and safety amongst all staff and to provide a bottom-up driven health and safety regime". Another (Leisure, large) stated that it was to "give staff more say about health and safety matters and any other matters";

• Two respondents expressly mentioned the possibility of employee fears. One (Printing, medium) said the procedure was introduced "to encourage employees to voice their concerns more and not to feel intimidated" and the other (Transport, large) said that there were "concerns that staff feel threatened by reporting something for which they feel to blame";

• Two respondents identified a general lack of reporting of health and safety problems as the reason for the introduction of a reporting procedure. One (Health, medium) said that "there was no proper procedure for reporting H&S problems and most often they are not reported at all" and the other (Waste, medium) said that there was a "concern [that] avoidable accidents were occurring due to lack of near-hit incident report. Also concern over likely suppression of 'bad news' by line management";

• One respondent said that his organisation (Mining, small) had instituted their procedure "as a result of a prosecution";

• Another (Printing, large) cited "high accident/near miss incidents, spiralling insurance premium costs [and a] lack of action via traditional health and safety committee procedures".

12.3 According to the procedure, to whom can employees report their concerns outside of line management?

• 22 respondents said that employees in their organisation could report directly to the organisation’s Health and Safety Manager or Health and Safety Department.

• 17 respondents said their organisation’s employees could report concerns to their Health and Safety Representative;

• 10 respondents said that their organisations encouraged employees to raise concerns with a named individual in senior management;

• 9 respondents said that their organisation allowed employees to go through their trades union safety representative, and

• One organisation (Health, medium) volunteered that employees in his organisation could report health and safety concerns to the Health and Safety Executive.

Some respondents emphasised their strong preference for all reporting to come through the normal line management hierarchy. One (Mining, large) said:

Our preference is to encourage health and safety comments through the local management. Comments which by-pass the management should be exceptional or a last resort since they could represent poor quality supervisory management.

Another (Construction, large) said:

We make every effort to only have concerns routed via immediate line manager unless no response/no action in indicated timescale, in which case [employees] can report up the line. [It is] essential to have an initial mandatory report to immediate line manager to avoid that manager evading his/her responsibilities and to encourage open two-way communication...
one [site there were] significant positive effects in two-way communication, but only because the [site] safety advisor ‘drove’ the system to ensure it was used.

This organisation, while strongly encouraging reporting through the line management structure, did allow employees to report in the manner of their own choosing.

12.4 How do these procedures deal with the identity of the employee raising the concern?

Lord Cullen’s inquiry into the Piper Alpha disaster found that offshore oil workers did not report health and safety concerns due to the prevailing culture of fear. In the experience of Public Concern at Work, employees sometimes find it easier to report sensitive matters - particularly where they feel that they personally might be regarded as being at fault - if they are provided with a safe route to do so. Such a route may involve a confidential option.

With this in mind, those respondents whose organisations did operate a procedure of some form were asked how the procedure dealt with the question of the reporting employee’s identity - whether it was essential that employees identified themselves openly, whether they were encouraged to do so, whether they had the option of remaining anonymous, whether anonymous reporting was discouraged, and whether reporting matters confidentially was permissible, and if so, was it encouraged or discouraged.

Almost all respondents indicated that employees in their organisation could make reports under the procedure in more than one manner, and many said that they left the question of identity up to the individual employee reporting the concern. The intention behind this question was not to obtain precise statistical data on different forms of reporting schemes but rather to get an impression of which forms of reporting were actively encouraged or discouraged by managers and, more importantly, to elicit their views and experiences as to the relative merits of different approaches concerning the issue of identity. The main results are reproduced in the box overleaf, where more detailed responses are discussed.
### 12.5 Key findings on Open, Anonymous and Confidential reporting of health and safety concerns

- Many managers (20) discouraged anonymity, although some respondents felt that giving a guarantee protecting the identity of the employee or not asking for their name led to more concerns being reported;

- A majority of organisations (39) possessing a procedure said that they actively encourage ‘open’ reporting. Some thought that if managers only encouraged anonymous or confidential reporting then employees would be wary of reporting concerns as it gave the impression that there was something wrong with reporting.

- Knowing the identity of the employee reporting the concern (possible only in ‘open’ and confidential systems) was felt to carry certain advantages. These merits were expressed by one respondent (Health, medium) in particular:

  1. You can trace the concern back to the source and get more information;
  2. You can report to them how and when it will be dealt with;
  3. [You can] even ask for their suggestions if appropriate.”

- 22 organisations (42% of those with procedures) said that they had in place provisions for confidential reporting.

#### 12.5.1. Open or no-blame systems

Most respondents (39, or 74% of those with procedures) stated a clear preference for a completely open system of reporting of health and safety concerns. A number said that they felt that a formal policy protecting the identity of the employee, whether through anonymity or confidentiality, sent the wrong message to the workforce. One respondent (Printing, medium) said that open reporting “proves to all employees that there are no reprisals for highlighting health and safety concerns.” Another (Mining, large) felt that it allowed for the “development of trust in the organisation”. One respondent whose organisation (Power, medium) operated a ‘no blame’ open policy said its advantage was that “you can openly praise a proactive approach and advise the person who reported the problem what has been decided (they may not always see the action they expected). It also encourages others as a ‘no-blame’ culture is established.”

Other comments of interest included the following:

**Waste, small:**

There is no secrecy or pressure from management to ignore or disguise risks therefore we have a completely open system.

**Textiles, medium:**

[Open reporting] makes people more aware of health and safety issues, and improves and speeds the communication of potential hazards.
The picture that emerges from health and safety managers and chief executives whose organisations operate open or no-blame procedures is that - in the view of respondents - such procedures possess certain advantages which help to stimulate a greater culture of trust and employee involvement in the workplace. One respondent (Leisure, large) stated that the “policy becomes owned by employees, [it is] not covert”. Another (Mining, large) said:

We encourage employees to come forward and be open regarding any concerns. We do not feel that confidentiality is necessary as safety is everyone’s concern. We require employees to be open and honest.

Another respondent (Waste, large) provided an interesting insight into the cultural value of open reporting:

...no pressure on employees, but [open reporting] allows outspoken employees to see their effectiveness and be recognised for it - thus encouraging others.

However, some respondents noted certain disadvantages to open or no-blame systems of reporting. One respondent whose organisation (Textiles, large) had no specific provision for other forms of reporting noted that a “lack of confidentiality/anonymity means less reporting” in practice.

12.5.2. Anonymous concerns
Respondents’ views on the use of anonymous information from employees produced the widest divergence of opinion. Two respondents remarked that anonymous reporting meant that employees were more likely to come forward. Another (Health, medium) said that he personally preferred staff to report matters anonymously because, in his view, it helps employees “speak more freely”, although he stated that “my superiors would rather identify individuals”. This manager felt that the identification of individuals has, in practice, “the opposite effect to openness [i.e. it discourages reporting] which tends to make health and safety more difficult to manage.”

A manager in a medium-sized company in the petrochemical industry said that in his organisation “should an employee request to remain anonymous we would respect his/her wishes.” However, such an option formed part of a wider no-blame policy, “in which all employees are encouraged to actively take part; some of the best incident preventive measures have been suggested by the shopfloor personnel.”

There were many objections to the use of anonymous reporting. 20 respondents said that their organisations discouraged anonymous reports. One (Mechanical engineering, large) said that managers “often get a distorted version” from anonymous reports, while acknowledging that such an option meant that employees were “more likely to come forward”.

12.5.3. Confidential reporting
22 organisations made some provision for the confidential reporting of health and safety concerns. Of those commenting on the advantages of this approach, one (Power, medium) said that the guarantee of confidentiality meant that the “employee may be more inclined to report [the concern]”. Another respondent whose organisation (Printing, medium) operated a confidential near-miss reporting scheme, noted that an advantage of confidentiality was that “often staff will telephone in details of an incident rather than complete a form.”
As noted earlier some respondents encouraged employees to report health and safety concerns in any way they felt comfortable. The advantages of this were described in the following comment:

Health, medium:
by encouraging people to come forward under their terms there is only a minimal barrier for staff to report.

12.6 Observations

12.6.1. Procedures
The fact that a majority of respondents (56%) state that their organisations have established procedures which allow employees to report health and safety concerns to someone other than their immediate line manager suggests that many managers do recognise that employees at times may have difficulties communicating with their immediate superiors and accordingly that alternatives need to be provided. These procedures take a variety of forms - some are formal, some informal, some provide several different alternative reporting routes, some provide only one or two, some insist on employees reporting themselves openly, others allow employees to report either anonymously or confidentially.

12.6.2. Procedures, Contracts and Assurances
From within the sample a sub-group of organisations emerged which had adopted at least two of the following measures, namely, placed their employees under a contractual requirement to report concerns about health and safety, gave them assurances against possible adverse repercussions if they fulfilled this obligation, and provided a reporting procedure which had alternatives to the normal line management hierarchy. 40 of the 47 respondents who said that their organisation placed employees under a contractual duty to report health and safety concerns also had a procedure as described above. Of those 40, 38 said that they had noticed a marked improvement (moderate or high) in the overall performance of health and safety in the organisation.

21 respondents had procedures and express contractual obligations requiring reporting and gave assurances against possible adverse repercussions. All these organisations found that there had been a moderate or high improvement in health and safety performance as a result of the introduction of some or all of these measures. Of these 21 organisations, ten had made provision for employees to report their concerns confidentially.

What this tends to show is that some managers have found that employees will respond positively to an appropriate mixture of rights, guarantees and opportunities when it comes to reporting concerns about health and safety. Managers who have taken this approach also state that there are real and noticeable benefits for their own organisation in terms of improved health and safety performance.

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2 see the HSC Annual Report 1995/6.
3 Ibid.
4 Court Inquiry, Department of Transport, Ct no.8074, 1987., at pp 23 - 25.
5 Ibid, at p24.
6 Woolfson, Foster and Beck, Paying for the Piper: Capital and labour in Britain’s offshore oil industry, (Mansell) 1997.
7 Public Inquiry into the Piper Alpha disaster, November 1990, HMSO, Cm 198.
8 Such views were expressed by workers interviewed in Paying for the Piper, broadcast by BBC Frontline Scotland in May 1996. This programme was based in part on the research done by Woolfson et al - see endnote 6.
9 The HSC Annual Report for 1995/6 showed that the rate of fatal and major accidents in the construction industry was 226.6 per 100,000 employees, second only to energy and water supply industries (229.4).
10 These regulations came into force on 31 March 1995. Most of the regulations (including the obligations under reg.18) do not apply to sites where the largest number of workers at any one time is less than five, or where the construction work is for a domestic (as opposed to business) client.
11 This figure is taken from the HSC’s discussion document Health and Safety in Small Firms (see endnote 1). In 1979 the percentage of private sector employees working in small firms was 35%.
12 For an explanation of organisational size, see para 5.2.
13 Throughout this report we refer to unsolicited comments made by respondents. As a matter of convention each comment is identified by reference to the sector from which the respondent came and the size of the organisation - e.g. (Construction, large).
14 Some respondents ranked more than one of the options as being of equivalent high importance.
15 See Reg.3(1).
16 Note that since October 1996 all employers are now required to consult with and provide information to employee representatives - who may or may not be union members - on health and safety matters. This follows the entry into force of the Health and Safety (Consultation with Employees) Regulations 1996 - for a more detailed discussion of the new requirements see Appendix A.
17 Research undertaken in relation to the offshore oil industry has revealed that the existence of legislative protection against victimisation and unfair dismissal does not appear to have produced an increased willingness on the part of employees to report health and safety concerns. Of greater significance, it would seem, is the economic imperative not to be seen to be a troublemaker - the fear of being told “don’t come back” at the end of a contract - see Woolfson et al. With a trend towards short-term contracts and the casualisation of labour in other sectors of the economy (health, for example - see section 2 above) the reluctance of employees to raise health and safety concerns may not simply be overcome through legislation.
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