



Beyond Compliance:

APPLYING A RISK LENS TO
YOUR EHS PRACTICE

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For any safety-conscious organization, achieving and maintaining compliance with safety regulations is an unquestioned duty. Failing to meet minimum OSHA requirements could result not only in legal headaches, but also in accidents, injuries, and a stagnant safety culture. But even companies that have compliance under control sometimes struggle to rise to the next level in occupational safety. What does this “next level” look like? According to experts, EHS professionals can elevate their programs—and improve work habits, safety culture, and profits in the meantime—by applying a risk lens to their EHS practice.

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“A risk lens means looking beyond the prevention of accidents and focusing on reducing the risks that have the potential to cause those accidents,” explains Robert Najjar, Ph.D., QEP, director of environmental health and safety at The Charles Stark Draper Laboratory. “It’s the next step in continuous improvement for any EHS program.”

Keith Harned, CSP, CPEA, who serves as the corporate health and safety director at LP Building Products, calls this risk lens a “natural fit” that should already be part of any top-notch safety program. “This is technically what we do every day to insert controls to protect people from hazards,” he says. “In the EHS field, we should be doing this every day.”

Below, Harned and Najjar, along with other experts, offer some practical information about risk—identi-

fying it, addressing it, and using it to improve safety programs and processes.

DEFINING RISK

To gain a basic understanding of risk and its many iterations in the EHS profession, we turn to the American Society of Safety Engineers (ASSE) Risk Assessment Institute, which was created to assist EHS professionals “find and implement both standardized and alternative risk-based approaches and measures to lead their organizations to pro-actively prioritize, resource, and mitigate risk in advance of injuries or catastrophic events.”¹

While any EHS professional worth his or her salt will have a basic understanding of risk and risk assessment, the Risk Assessment Institute provides detailed resources in the form of sixteen Core Competencies.² These core competencies, which offer a ho-

listic representation of considerations for adequate risk assessment, include but are not limited to: safety management system implementation; risk management principles and guidelines; risk assessment terminology and techniques; evaluating and analyzing risk; monitoring risk control measures; serious/fatal injury prevention; risk communication; and more.

These competencies reveal that applying a risk lens can indeed be a complex, interconnected method—there’s no one-size-fits-all risk assessment program out there. Instead, organizations must carefully identify, analyze, assess, and communicate the risks they may face. According to the Institute, “The time has come for a transformation of safety leadership through ‘proactive,’ preventive approaches that can identify risks and enable action in advance of injury, illness, or loss.”

Kirstin Ferguson, Ph.D., professional board director and founder of Orbitas Group, offers another way to view risk: the safety governance pathway.³ This model can help define how well an organization's senior executive team works with safety leadership, which can serve as a litmus test for overall safety performance. The safety governance pathway consists of five stages, which Ferguson details⁴ below:

- **Transactional** – Organizations in this first and least effective stage enact a minimal influence on safety, according to Ferguson. Safety is viewed as management's responsibility and is only taken into consideration once an incident has already occurred. As a result, Ferguson says, "there's no real vision for safety."
- **Compliant** – In this stage, company leadership is aware of legal responsibilities to safety, but fear fuels their approach. When compliance is king, there is a failure to consider "what drives safety behaviors or safety leadership as a concept," Ferguson stresses.
- **Focused** – Organizations in this third phase have begun making progress. During this stage, EHS professionals or leadership might introduce leading, rather than lagging, indicators; there's a greater focus on safety; and safety management systems may be introduced. "This is where boards often demand

more from management [in terms of safety]," Ferguson says.

- **Proactive** – This stage represents a true shift in how safety is viewed and addressed company-wide. The company's board takes an active role in safety, and safety professionals often have a direct line to leadership.
- **Integrated** – This final stage represents the pinnacle of safety governance. "The most effective organizations are where safety is completely integrated with the operations of the organizations," Ferguson says, and "business excellence is understood to be an output of safe production."

To progress through these stages, an organization needs focused attention on risk not only from EHS professionals, but also from company leadership and the board. "While safety governance systems provide tangible outcomes such as EHS decision-making structures, outcomes and objectives, monitoring the frameworks and compliance, to be effective it relies on leadership," Ferguson says.

BEYOND COMPLIANCE

Take note that the "compliant" phase of the safety governance pathway is the second-lowest stage of development. Experts agree that EHS professionals must reach beyond compliance in order to advance their safety programs.

"OSHA compliance will only get you average [results]," says Harned. "We are not into being average – we believe our employees deserve and respect more than compliance."

While Harned acknowledges that EHS professionals and OSHA share the common goal of reducing injuries and creating safer workplaces, he says current regulations will only produce that "average" work-



place. At LP Building Products, Harned and his team shoot far above the baseline requirements for mere compliance. This might mean taking a current OSHA standard—say, on hot work—and examining every angle of this type of work to create detailed policies and procedures that go above and beyond what OSHA requires. In other cases, it might entail creating procedures for at-risk practices even if they don't fall under a specific OSHA standard at all.

Fay Feeney, ARM, CSP, is CEO of Risk 4 Good, which advises corporate and board leaders, stresses that business can suffer when risk isn't part of the equation. "Businesses are in this for a purpose—to grow that business without undue risk," she says. That growth will be hindered by purely compliance-driven programs. The world of compliance is a static

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one, with a U.S. regulatory climate often fraught with political showdowns and delays. Focusing on safety compliance is merely transactional, she explains, while applying a risk lens is strategic.

But how can EHS professionals move beyond compliance to apply a risk-based lens and heighten their safety performance? Experts offer the following tips:

BEST PRACTICES FOR APPLYING THE RISK LENS

TIP 1 Foster employee engagement. In order for a risk-based approach to thrive in any EHS program, employees must be invested and on board. "There's a big difference between doing what you ask me to do and me being involved in how to do it," Harned explains. "If employees are involved, there's ownership." He suggests asking employees directly how they can be better identify risk and be protected rather than merely giving them orders. After all, these workers "are already experts in how to do that work."

TIP 2 Ensure leadership buy-in. If company leadership isn't fully on board, a risk-based approach might be destined to fail from the start. "If your EHS department doesn't have the commitment or resources to effectively and quickly respond to worker EHS issues and doesn't have the cooperation of senior and line management, then the workers will not believe that the company really cares about their safety," Najjar points out. Ferguson adds that "an integrated approach to safety governance is dependent on all leaders of the organization, including the board, being aware of the impact their personal decisions and commitment to EHS have on the culture of an organization. Too often, progress on safety governance can be impacted negatively by a change in CEO or president where the same personal commitment to EHS is not apparent."

TIP 3 Be strategic. According to Ferguson, EHS professionals must be able to coach, guide, and lead their corporate leadership in the world of EHS. "It is critical for EHS professionals to think strategically about EHS—that is, understand the link between EHS outcomes and business excellence—and educate others," she says.

TIP 4

Employ pilot programs. At Draper, new EHS initiatives are introduced to senior management as pilot programs. Such trials may last three to six months; after the pilot has proved successful, it is officially funded and moved out. “Trying to turn on a new EHS program like a light switch across the whole organization is met with resistance and usually flounders or fails,” Najjar says. The pilot program, however, provides the chance to address any issues and also gives employees ownership of the process.

TIP 5

Conduct comprehensive audits. Draper’s two-tiered audit program for high-hazard areas identifies, logs, and tracks safety issues. “The key to our audit program is that in addition to identifying and fixing safety issues, it reduces the po-

tential for lost-time injuries and illnesses,” Najjar says. LP Building Products also has a robust auditing system in place for every plant, including comprehensive EHS assessments completed every three years.

TIP 6

Invest in systems and tools. Data is power in the EHS world, and certain tools and processes can help harness that power. EHS managers who find internal audit systems to be inefficient or cumbersome may wish to consider investing in customized data management, which can include automated audit tasks, custom data collection, and live-linked data to better ensure current and accurate documentation. Any tool that helps EHS professionals better analyze and communicate safety data will also help sell safety within the organization at large.



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Start small. Changing your organization's approach to risk won't happen overnight—and EHS professionals who try to do so may find themselves overwhelmed. "You have to start somewhere," says Harned. "Pick one hot-button issue and drill down on that. Recognize that you can't do everything at once."

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Finally, make safety interesting. Bring your safety programs to life, especially when selling them to others. "I sit on a number of boards," Ferguson explains, "and those that have the strongest safety cultures have EHS professionals that can ensure EHS issues are viewed by the board and corporate leadership beyond mere statistics or compliance with legislation."

REAPING THE BENEFITS

EHS leaders are quick to cite many of the benefits that can arise from applying a risk-based lens to an EHS program: reduced injuries, reduced workers' compensation, increased productivity, and improved safety culture. But Feeney stresses that EHS professionals themselves should be conscious of risk for another reason: the security of their own jobs.

"It's a matter of career survival," she says, suggesting that EHS professionals today must look past the status quo (e.g., compliance) in order to cement their place as desired experts. A safety leader who embraces risk management is more likely to enjoy professional growth and make a greater impact within the organization. "When you move into risk management, you're not working alone," she says. "You're on the leadership team."

Perhaps the ultimate goal is to create a ripple effect throughout the organization—the kind of effect that makes the risk lens a permanent fixture. Draper's efforts to place a proactive focus on risk, for example, "have improved culture, reduced injuries, and have gained the worker's trust," Najjar says. But it goes even farther than that. "Draper researchers come to

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the EHS office before buying new hazardous materials or equipment to see what they need to do to use them safely," he adds. "They want it to go smoothly and not cause an injury or release. That is a cultural shift in the right direction!"

RISK: THE LANGUAGE OF BUSINESS

Compliance will only take an EHS program so far. In order to create a superior safety program, EHS professionals must broaden their view and apply this risk lens to all programs, practices, and policies. As a result, this risk-based approach can have far-reaching effects on workplace safety, performance, and culture.

"Remember, risk is the language of business," Feeney stresses. "Businesses are trying to achieve value creation and risk mitigation—not just one or the other. Being risk-informed is essential."

References

¹ASSE Risk Assessment Institute. <http://www.oshrisk.org/about/institute.php>

²ASSE Risk Assessment Institute – Core Competencies. <http://www.oshrisk.org/fundamentals/core.php>

³Orbitas Group – Safety Governance. <http://www.orbitasgroup.com/safety-governance/>

⁴Kirstin Ferguson discusses the five stages of safety governance at the 2015 Safeguard National Health and Safety Conference. <https://www.youtube.com/watch?v=r9UyR4Plvcs>