

# RECLAMATION

*Managing Water in the West*

## **Safety and Occupational Health Action Plan Team 8**

## **Promoting Trust and Cooperation Version 2**



U.S. Department of the Interior  
Bureau of Reclamation

June 2015

## MISSION OF THE U.S. DEPARTMENT OF THE INTERIOR

### PROTECTING AMERICA'S GREAT OUTDOORS AND POWERING OUR FUTURE

The U.S. Department of the Interior protects America's natural resources and heritage, honors our cultures and tribal communities, and supplies the energy to power our future.

## MISSION OF THE BUREAU OF RECLAMATION

The mission of the Bureau of Reclamation is to manage, develop, and protect water and related resources in an environmentally and economically sound manner in the interest of the American public.

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## Executive Summary

Conclusion 2-1 of Interior's review of Reclamation's SOH Program (Interior 2013) stated that "Reclamation has established mechanisms, forums, and opportunities for employee involvement, but has not yet embedded a culture that empowers and encourages employees to pro-actively recognize, identify, and correct facility hazards and compliance issues." Team 8 was assembled to identify ways to build trust and cooperation among management, employees and employee representatives with a goal of improving safety within Reclamation.

Reclamation's objectives related to building trust and cooperation in its safety programs are to:

- Support individuals' trust in themselves, so they are confident they have the knowledge and skills to operate safely;
- Support individuals' trust in each other, so they are confident their colleagues will keep them safe;
- Support individuals' trust in the organization, so they are confident the organization is committed to their safety; and
- Strengthen Reclamation's safety culture so that all employees cooperate in providing safe working conditions and working safely.

In *The Speed of Trust (2006)*, Stephen M. R. Covey describes trust as being built by demonstrating equal parts **character** and **competency**; leaders, individuals, and teams must be viewed as having both integrity and the ability to meet commitments. To demonstrate character and competency, Covey recommends "actionable" behaviors. These trust building behaviors can be aligned into three broad categories: show care for others, communicate, and take action.

To build cooperation, Reclamation employees must have **trust** (character plus competency), **shared understanding**, and **shared objectives**. Recommendations in this report are designed to promote a culture of caring for safety and foster each of the elements of trust and cooperation. They are summarized below:

1. Create a Safety Program Pocket Guide (the Guide) and intranet resources – many of the materials in this report and from other teams can be included in the Guide
2. Implement the motto "I Care About Safety" Reclamation-wide
3. Communicate Expectations for Leadership Engagement in Safety
4. Fully Implement Collateral Duty Safety and Health Officer Program
5. Uniformly Implement Stop Work Policy and Guidelines
6. Document Accident Follow-up Processes
7. Implement effective safety committees
8. Hold effective safety meetings

The recommendations listed above include limited modifications to Reclamation Policy and Directives and Standards. The Guide will be a key unifier and programmatic reference for safety within Reclamation. It will contain much of the information discussed for each recommendation herein, as well as information generated by other teams. Recommendations 1, 4 and 6 will require additional work to build policy and content, while the remainder are more complete and would only require finalization.

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## 1. Acronyms

AC4P	Actively Caring For People
ANSI	American National Standards Institute
CDSO	Collateral Duty Safety Officer
CFR	Comprehensive Facility Review
D&S	Directives and Standards
DO	Denver Office
DSIS	Dam Safety Information System
HR	Human Resource
JHA	Job Hazard Analysis
O&M	Operation and Maintenance
OSHA	Occupational Safety and Health Administration
RLT	Reclamation Leadership Team
RSHS	Reclamation Safety and Health Standards
SOH	Safety and Occupational Health
VTC	Video Teleconference
WO	Washington Office

## 2. Background

The Bureau of Reclamation has a long history of focusing on safety in its operations, dating back to the construction of Hoover Dam in the 1930's, when mandatory hard hat usage was first required on a construction site. Recently, issues documented during Occupational Safety and Health Administration (OSHA) inspections of large facilities, a Department of the Interior Office of Occupational Safety and Health review of Reclamation's Safety and Occupational Health (SOH) program, and several tragic accidents have reminded us that building and maintaining an effective safety culture requires continual efforts (Reclamation 2014a). As an organization, Reclamation must modify the way it addresses and manages safety.

As outlined in the Reclamation SOH Action Plan (Reclamation 2014b), 21 Reclamation-wide teams were assembled to improve a wide range of SOH program elements. Conclusion 2-1 of Interior's review of Reclamation's SOH Program (Interior 2013) stated that "Reclamation has established mechanisms, forums, and opportunities for employee involvement, but has not yet embedded a culture that empowers and encourages employees to pro-actively recognize, identify, and correct facility hazards and compliance issues." Team 8, with members listed in Table 1, was assembled to identify ways to build **trust** and **cooperation** among management, employees, and employee representatives with a goal of improving safety within Reclamation. Members of Team 8 represent each of Reclamation's regions, a range of positions, and union and non-union membership.

**Trust is the essence  
of leadership.**  
-- *Colin Powell*

**Table 1. Members of Team 8.**

Name	Region	Position
Lorri Lee (Executive Sponsor)	PN	Regional Director
Roland Springer (Team Lead)	PN	Assistant Area Manager
Scott Schuman	GP	Safety and Occupational Health Specialist
Maria Germain	LC	Contract and Repayment Specialist
Peter Harbauer	LC	IT Specialist
Nathan Lenon	LC	General Biologist
Shana Kaplan	MP	Chief of Staff
Theresa Olson	MP	Supervisory Natural Resource Specialist
Tyler Byrne	PN	General Maintenance Work Leader
Carron Helberg	PN	Water and Land Specialist
Rick Reese	UC	Field Division Manager
Mike Talbot	UC	Supervisory Civil Engineer
Gary Anderson	DO	Policy Analyst

## 2.1 Objectives

Reclamation's objectives related to building trust and cooperation in its safety programs are to:

- Support individuals' trust in themselves, so they are confident they have the knowledge and skills to operate safely;
- Support individuals' trust in each other, so they are confident their colleagues will keep them safe;
- Support individuals' trust in the organization, so they are confident the organization is committed to their safety; and
- Strengthen Reclamation's safety culture so that all employees cooperate in providing safe working conditions and working safely.

## 2.2 Overview of Trust and Cooperation

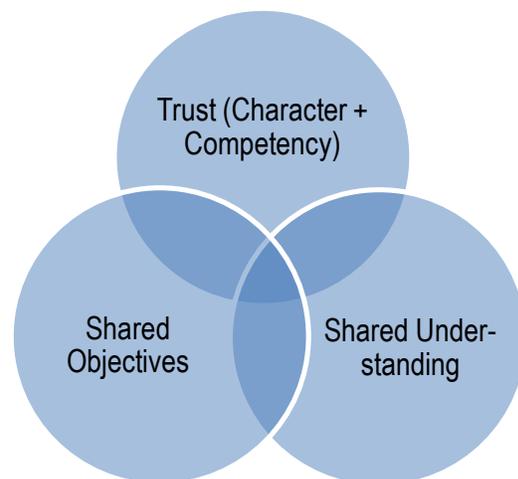
**Trust: belief that someone or something is reliable, good, honest, effective, etc.**

**Cooperation: common effort, association of persons for common benefit.**

Trust is an intangible asset that can exert a strong influence (positive or negative) on the level of commitment, information sharing, and accomplishment that takes place within an organization. It also influences how leaders' words and actions are perceived within their organizations. High levels of trust yield increasing speed (or productivity) and decreasing costs, while low levels of trust impose higher costs and lower speed (or productivity) (Covey 2006).

While trust cannot be measured directly because it exists within the minds of individuals (Brower et. al 2000), it provides the atmosphere where cooperation can happen (Dirk and Ferrin 2001). **Cooperation**, or working together toward the same goal, requires the presence of three elements – **trust, shared understanding, and shared objectives**.

The benefits of high-trust environments are demonstrated by the significant differences in the dynamics within high-trust and low-trust environments. In situations where trust levels are high, individuals cooperate and share resources and information (e.g., regarding safety practices, hazards or accidents). Individuals are more likely to view the actions of other individuals or groups positively, leading to greater



**Elements of Cooperation**

cooperation. High trust, combined with shared understanding and objectives, leads to cooperation. With low trust, individuals concentrate their resources and efforts towards personal goals and interests, and may avoid sharing information or contributing to group goals. The actions of others are more likely to be interpreted negatively, leading to obstructive behaviors. Management can capitalize on high-trust situations by simplifying structure and processes, while low-trust situations often lead management to create highly structured environments (Dirk and Ferrin 2001).

With its decentralized organization operating through multiple regions and area offices, Reclamation can improve trust and cooperation by developing a consistent safety culture throughout the agency. Senior leaders should set the expectations for safety, while leaders and staff at all levels should consistently take actions that exhibit a shared commitment to safety.

## 2.3 Principles for Developing Trust and Cooperation

In *The Speed of Trust* (2006), Stephen M. R. Covey describes trust as being built by demonstrating equal parts **character** and **competency**; leaders, individuals, and teams must be viewed as having both integrity and the ability to meet commitments. To demonstrate character and competency, Covey recommends “actionable” behaviors. These trust building behaviors can be aligned into three broad categories: show care for others, communicate, and take action, as summarized below:

### Show Care for Others

- Act with honesty, integrity and in the best interest of others (caring)
- Demonstrate respect
- Right wrongs
- Show loyalty
- Extend trust to others

### Take Action

- Walk the talk (be a role model)
- Demonstrate ethical conduct
- Keep commitments
- Deliver results
- Practice accountability
- Get better (continuously improve)
- Be willing to be influenced by others (flexible)

### Communicate

- Listen first
- Talk straight
- Confront reality
- Clarify expectations
- Create transparency

As individuals at all levels of Reclamation – not just leaders – exhibit these behaviors, character and competency will be evident. Demonstration of character and competency at all levels within Reclamation will build trust. Combined with actions that promote shared understanding and shared objectives in relation to safety, Individuals throughout Reclamation will cooperate with each other in maintaining the safety culture.

Team 8’s recommendations are all designed to help Reclamation strengthen trust and cooperation through accomplishing the following actions:

- Demonstrate character
- Demonstrate competency
- Promote shared understanding
- Promote shared objectives

### 2.3.1 Establishing a Culture of Caring about Safety

Team 8 recommends that all actions taken as a result of the SOH Action Plan effort focus on developing a culture where individuals at all levels of the organization demonstrate they care for each other’s safety as an organizational value.

*Actively Caring for People* (Geller 2014) summarizes years of research related to building cooperation through actively caring for safety. A key to building shared commitment to safety is asking others to take positive measures to be safe because they care, rather than promoting consequences of being unsafe. Geller quotes an example where communities achieved much higher seat belt usage resulting from a “Buckle up because I care” campaign than from a “Click it or ticket” campaign.

Figure 1 shows key elements that integrate into forming a safety culture. While many concepts discussed in *Actively Caring for People* are included in the SOH Action Plan, Reclamation needs to integrate its efforts into a safety culture.



**Figure 1. Elements of a Culture of Actively Caring (Geller 2014).**

In order to build trust, leaders must actively promote safety as an organizational value. Psychologically, this will support employees knowing and doing the right things. By making safety an organizational value, Reclamation leaders will demonstrate caring for the entire team and individuals will demonstrate caring for each other's safety, both of which are key to building trust and cooperation in a safety culture.

If employees perceive that their supervisors do not care about their well-being, they will be less likely to follow safety policies or produce high-quality work products. Not only does the leadership style of a supervisor affect how his/her employees perform, but it affects the morale of the organization.

Motivating employees to be safe is not about expressing the need to conform to rules and regulations, but rather working with employees to understand what change is needed in order to successfully address safety issues. Honest expressions of caring by leadership will facilitate cooperation.

### **2.3.2 Barriers to Trust and Cooperation**

As Reclamation focuses on improving its safety culture and strengthening trust and cooperation, it should address barriers that may limit success. While some of these barriers may only be perceived, they still can affect success and should be managed; many are being addressed through SOH Action Plan activities. Each of these can be overcome with the building blocks of trust and cooperation mentioned above. Potential barriers include the following:

#### Staff perceptions and attitudes

- Employees may feel that managers and leaders do not put a priority on safety in light of competing priorities.
- Employees may fear that reporting an accident/incident/safety concern may result in penalization, additional onerous processes, or the appearance of being a “tattle tale.”
  - Underreporting can limit Reclamation's ability to identify issues, improve operations, and prevent future incidents and accidents.
- Staff may not believe that proposed safety improvements will be completed or make a difference.
- Staff can be frustrated that there is little or no reward for taking the proper safety precautions and achieving positive safety accomplishments.
- Employees may feel overburdened by additional rules or policies.

#### Leadership

- There is inconsistent cooperation, support, and involvement of leaders or other team members in safety activities.
- The tone and focus of incident or accident follow up can be perceived as being reactive and punitive rather than proactive and improvement-focused.
- There may be a lack of resources (time and money) to address safety issues.

Role of SOH staff

- There is a lack of understanding of roles and responsibilities of SOH staff and others participating in SOH activities (including collateral duty safety officers).
- SOH staff may be viewed as focusing on exposing problems rather than creating solutions, and not understanding of realities of the work.

Procedures

- Procedures may be created by people who are unfamiliar with a specific task, which can result in requiring work that is not necessary and may present safety challenges.
- Continuing increases in reporting and administrative requirements make it challenging to focus attention and priorities on safety issues.

### ***Industry Lesson - United States Coast Guard***

*After 9/11, The United States Coast Guard came under scrutiny from the maritime industry and Congress for a deterioration of performance and service. Many pointed to its change in role from maritime safety to maritime security. A November 16, 2007 report identified, among other concerns, that the maritime industry had lost trust and confidence in the Coast Guard, due to the loss of the partnership relationship between both entities.*

*The report suggested rebuilding the trust relationship through better customer relations, tracking of responsiveness, increased communication, leaders taking an active role (rather than delegating), development of an engagement strategy, use of advisory committees, and reinstatement of the "Prevention through People" program.*

*Based on the report, the Coast Guard expanded partnerships, increased communication, and increased leadership involvement. In addition to rebuilding the trust relationship, results of efforts during the first year (2009) indicated renewed safety successes, with a decrease in injuries and deaths.*

<http://www.uscg.mil/marinesafetyprogram>

### ***Industry Lesson - Cummins, Inc. "Safety Begins with Me" (Geller 2014)***

*At Cummins, Actively Caring for People (AC4P) means everyone in the decision-chain has the compassion to collectively and continuously identify, manage, and mitigate risks. How does an organization like Cummins move hundreds or thousands of employees from caring to actively caring? At Cummins it's called "Safety Begins with Me." Organizations need to manage pressures and provide technicians the time and resources needed to get the job done safely. Leadership must send a strong signal of commitment by making time and resources available for safety. Unfortunately, many performance metrics are often conflicting and result in confusing directives for expected behavior. For safety metrics, injury rate is the lagging-metric used most often to indicate safety-related performance. Organizations that rely on only avoidance-oriented lagging indicators are uninformed about how to move forward.*

*Cummins invested diligently to create a climate for change. AC4P leaders needed to follow a structured change-management process to overcome apathy generated by those superficial quick fixes. In order to create a climate for change, a sense of "urgency" was created. Cummins then developed a design team, set a vision, rolled out the new initiative, and solicited feedback to remove potential barriers to success. Any organization implementing a new initiative is faced with the same challenge: Sustainability. The key to sustainability is creating a "process" that does not have a beginning and an ending (like a never-ending series of flavor-of-the-month programs). Then it evolves with the safety culture and is truly a continuous-improvement initiative. Leading indicators are safety related behaviors, including compliance to rules, training activities, safety processes, VPs walking the shop floor, executives attending team meetings and/or monthly safety communications.*

*Over a two-year period, Cummins implemented the initiative, accumulated observations, conducted conversations based on these observations, and corrected at-risk conditions and/or behaviors. The rate of injuries decreased 20% each year and lost-work days were reduced by half, but most importantly, Actively Caring for People was becoming embedded in the safety culture. These improvements all came from people throughout the organization actively caring for their technicians and developing solutions for problems. The journey is far from over, but these technicians now have the tools to recognize and manage hazards, and they have the ongoing support of an organization continuously learning how to actively care more effectively for all its employees.*

### 3. Recommendations

This section describes specific recommendations for building and improving trust and cooperation within Reclamation. These recommendations are designed to develop a culture of caring where individuals at all levels of the organization demonstrate they care for individual safety as an organizational value. Table 2 lists each recommended action and how it ties to the basic elements of trust and cooperation.

**Table 2. Actions recommended for building trust and cooperation.**

Recommendations	Trust and Cooperation Element			
	Character	Competency	Shared Understanding	Shared Objectives
1. Produce Reclamation Safety Program Pocket Guide and intranet resources	X	X	X	X
2. Implement the motto “I care about safety” Reclamation-wide	X			X
3. Communicate expectations for leadership engagement in safety	X		X	X
4. Fully Implement Collateral Duty Safety Officer (CDSO) program		X	X	X
5. Uniformly implement “Stop Work” policy and guidelines	X			X
6. Document accident follow-up processes	X	X	X	X
7. Implement effective safety committees		X	X	X
8. Hold effective safety meetings		X	X	X

Reclamation managers should maintain a general environment of trust and cooperation that will reinforce all organizational values, including safety, by incorporating the following actions as part of conducting business:

- Keep commitments
- Continuously work to support employee morale
- Continuously work to improve operational performance

Details related to each action include objectives of the action, a detailed description, roles and responsibilities, benefits, risks/barriers, activities required and general timelines for implementation of the action. These details can be incorporated into Reclamation policy and

guidance as appropriate.

The following subsections present details regarding each action, including activities that comprise the action, roles and responsibilities, benefits, risks, and operational costs; and implementation information.

### **3.1 Recommendation 1 - Produce Reclamation Safety Program Pocket Guide and Intranet Resources**

Reclamation should develop a Safety Program Pocket Guide (the Guide) to communicate and focus Reclamation's safety culture and provide a ready reference on how safety is managed programmatically throughout the agency. This guide should be supplemented by safety resources on Reclamation's intranet.

#### **3.1.1 Purpose and Need**

There is no single resource that employees can quickly access to understand various aspects of safety within Reclamation. Team 8 found that employees have very different levels of knowledge in safety basics and there is a wide variability in safety resources within regions and area offices. There is a need for all employees to have access to safety information to ensure consistency and develop a common safety culture throughout Reclamation. The Guide will be a pocket-size reference covering the fundamentals of Reclamation's Safety Program; it will be the core document in driving Reclamation's safety culture.

#### ***Benefits***

The Guide will increase trust and cooperation by increasing the basic level of safety competence of all employees. It will promote the shared understanding and shared objectives of a common safety vision. The Guide will:

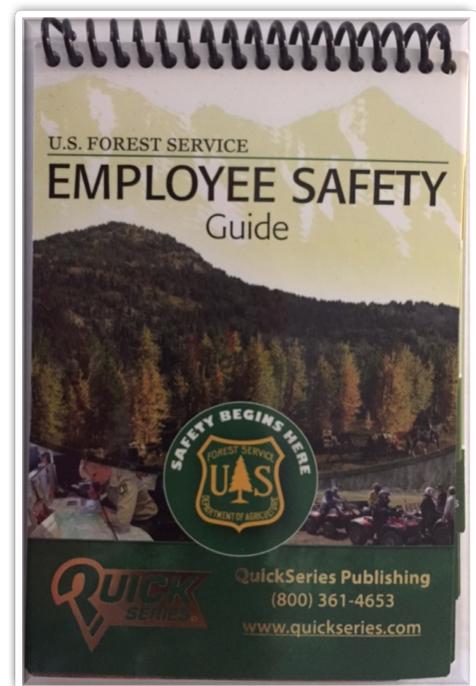
- Demonstrate Reclamation's commitment to caring about safety and support the safety culture by providing all employees with consistent information
- Support consistency in Safety Program implementation and link safety throughout Reclamation
- Save time and money messaging important aspects of the Safety Program
- Serve as an outreach tool containing important safety information in layman's terms that is easily accessible by all employees
- Support continuity of operations and maintain institutional knowledge
- Support a safe working environment which will positively impact performance
- Reinforce training on safety policies and procedures

### 3.1.2 Description of Actions

The Guide will be a spiral bound ready reference, approximately 3.75 inches by 5.5 inches with laminated card stock sheets arranged by topic. It will be provided to all existing Reclamation employees and be distributed to new employees as part of the onboarding process. Examples of the potential finished product are guides produced by Quick Series Publishing, including the Department of the Interior Ethics Guide and U.S. Forest Service Employee Safety Guide.

The Guide will be a concise reference containing a compilation of the most essential and credible information on safety. It will adapt and distill complicated information into an easy-to-understand format that all employees can use to address everyday safety issues. The easy-to-carry format will allow readers to rapidly find pertinent information wherever they are. The Guide will be a toolbox containing quick-reference tables, checklists, and charts to help increase the retention of information. Reclamation can use the Guide as a support tool to assist in branding the Safety Program.

Many topics in the Guide will be based on the work of the SOH Action Plan teams. Examples of important topics to be covered in the Guide are: SOH Program Vision and Motto, Reclamation's Safety Culture (including concepts of Trust and Cooperation, and Figure 1 of this document), Roles and Responsibilities, Collateral Duty Safety Officers, Stop Work Policy, Training Requirements and Options, Safety Meetings and Committees, Reporting Incidents and Near Misses; JHAs, and links to other resources. A potential Table of Contents is shown in Figure 2.



<p><b>Program Overview</b>                  SOH Program Vision And Motto                  Reclamation Safety Culture                  Leadership Participation in Safety                  Roles And Responsibilities                  - Including Safety Officers and                  Collateral Duty Safety Officer                  (CDSO)                  Resources for You                  Policies and Procedures                  - Including Stop Work Policy                  Training</p> <p><b>Health and Safety</b>                  Employee Assistance Program                  Wellness Program                  Health and Safety Accident                  Prevention Plan                  Emergency Medical Response and                  Evacuation Plan                  Violence in the Workplace                  Hazard Communication                  Job Hazard Analysis (JHAs)</p>	<p>Standard and Chemicals in the                  Workplace</p> <p><b>Reports and Communication</b>                  Check-Out/Check-In                  Reporting Incidents                  Post-Accident Procedures                  Tracking and Resolving Safety Issues                  Safety Meetings                  Safety Committees</p> <p><b>Personal Safety</b>                  Personal Protective Equipment                  Respiratory Protection                  Fatigue, Distractions and                  Complacency While Driving                  Blood-Borne Pathogens                  First Aid and CPR                  Hearing Loss Prevention                  Back Care And Lifting</p>	<p><b>Technical/Environmental                  Hazards</b>                  Housekeeping                  Slips, Trips, and Falls                  Lockout/Tagout                  Confined Spaces                  Arc Flash                  Wildlife and Environmental                  Conditions in the Field                  -Including Vector-Borne  <b>Disease</b>                  -Poison Oak/Ivy/Sumac                  Motor Vehicle Training                  Participation in Aviation</p> <p><b>Resources/Links</b>                  Reclamation Intranet                  OSHA                  Centers for Disease                  Control</p>
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**Figure 2. Potential Contents of the Reclamation Safety Program Pocket Guide**

Supplemental resources related to topics in the Guide will be added to a Safety page on Reclamation’s intranet site. These resources will include information too lengthy for a pocket reference or which changes frequently, such as resources for safety meetings.

The Guide can also be produced as a smartphone app, which could be updated more frequently and contain links to intranet pages. Smart mobile devices are not available to all Reclamation employees, but an app would have increasing utility as use of these devices increases.

**3.1.3 Implementation**

The following general actions need to occur in order to develop, implement and maintain the Guide. Roles for each implementation action are identified in parenthesis after the description.

- Form a team to finalize materials for the Guide (Reclamation SOH Council)
  - The development team will make the Guide’s contents consistent with SOH all action teams outcomes and the current Reclamation Safety Program
  - As an example of industry services, the company that prepared the example guides cited above provides editorial, typesetting, and other services for production, and can use information from other Federal guides it has produced to streamline preparation costs.
- Provide each new and seasoned employee with a copy of the Guide (Supervisors)
- Provide instructions and link to download e-copy or app of the Guide, if used (Safety Manager or Reclamation SOH Council)

- Coordinate with training groups to introduce the Guide to employees during initial safety training and annual safety training. (Safety Managers)
- Post related safety information on Reclamation’s intranet (SOH Council, in cooperation with Public Affairs)
- Create a process to update intranet resources on a regular basis, as needed. (Reclamation Safety Manager)

### **External Costs**

The 40-page Forest Service Employee Safety Guide cost approximately \$4.00 each for a large-quantity order. A similar-sized guide for a print run of 7,000 (for Reclamation’s approximately 5,200 employees, plus 1,800 spares) would cost \$28,000. Companion apps, if provided, would cost approximately \$3.50 each, also based on a large order.

### **Schedule of Deliverables**

<b>Implementation Activity</b>	<b>Responsible Office</b>	<b>Time Frame</b>
Produce Safety Program Pocket Guide and intranet resources	Reclamation SOH Council	1 year

## **3.2 Recommendation 2 - Implement the Motto "*I Care About Safety*" Reclamation-Wide**

Reclamation should implement a motto (“I Care About Safety”) to focus the safety culture Reclamation-wide.

### **3.2.1 Purpose and Need**

The SOH Action Plan effort included a new safety vision for the entire agency. Safety mottos are often a part of communicating a safety vision, and are included in print and electronically in documents, drawings, posters, and other materials. Throughout Reclamation, a variety of safety mottos are used, including “safety first,” “safety always,” and “Always Think Safety.” Team 8 recommends a single motto that ties the safety culture together by including the element of personal responsibility. It would reinforce the message often stated by leaders and managers, that “we want all of our employees to go home each night with all their fingers and toes,” since we care about our people.

### **Benefits**

This motto will promote individual and organizational commitment to a safety culture where all employees care about proactively addressing safety issues. Other benefits of implementing this motto include the following:

- Consistent messaging will demonstrate Reclamation’s commitment of caring about safety
- A common motto will help unite Reclamation around the safety vision

### 3.2.2 Description of Actions

Team 8 recommends the following activities to implement this recommendation:

- Kick off use of the motto with a letter/endorsement from the Commissioner.
- Include the motto as a tagline on official communications.
- Publish the motto in a variety of places throughout the organization, such as in stickers that can be placed on property, on posters, on drawings, and in web pages.
- Include the motto in products of the safety incentive program (SOH Team 6).

### 3.2.3 Implementation

This recommendation requires little additional effort. Reclamation’s SOH Council and Public Affairs should follow up with regions and area offices to implement the motto in Reclamation materials.

#### *Schedule of Deliverables*

Implementation Activity	Responsible Office	Time Frame
Include Motto in Reclamation Materials	Reclamation Safety and Health Office and Public Affairs	3 months

## 3.3 Recommendation 3 – Communicate Expectations for Leadership Engagement in Safety

Team 8 recommends Reclamation slightly modify D&S SAF 01-01 and include general guidance for leaders (Directors, Managers and Supervisors) in the Guide in order to set expectations for leadership engagement in relation to safety that are understood by leaders and staff.

### 3.3.1 Purpose and Need

Team members found that many staff members have a perception that leaders are disengaged from physical work and associated safety issues. This may be because leaders have a variety of safety experience, both within and outside of Reclamation, while leaders and staff have a wide range of understanding and expectations regarding the appropriate participation of leaders in

safety issues. As discussed in Section 1, if understanding is not shared, it is difficult to achieve trust and cooperation; this recommendation is intended to promote a shared understanding of the appropriate roles for leaders in safety, and help leaders better understand safety needs.

### **Benefits**

The benefits of communicating general guidance for leaders in relation to safety include:

- Employees will see that leaders are committed to safety and they value their employees.
- Employees will trust that leaders understand their needs in relation to safety, and how safe conditions are developed and maintained
- Employees will be motivated to follow safety leaders and trust the direction they give.
- Leaders will develop a more concrete understanding of safety issues and risks faced by employees, and appropriate ways to manage risks.
- Demonstrated commitment of Reclamation’s leaders will help drive safety as a shared objective throughout Reclamation

### **3.3.2 Description of Actions**

Leaders demonstrate their commitment to safety through their actions and how they empower others. ANSI Z10 states that management is to give visible support and take an active role in safety activities. As part of the SAF P01 (E)(3), Directors and Managers are responsible for ensuring mechanisms are in place to incorporate SOH into operational activities and processes.

#### Recommended addition to D&S SAF 01-01.4.E:

Team 8 recommends revising Reclamation’s D&S SAF 01-01 to include an expectation for leaders to actively participate in SOH activities. This change supports Reclamation Policy SAF P01, which incorporates the principles of ANZI Z10 into SOH management processes. In other words, this aligns the D&S with the intention of the policy. Our recommendations include adding the following text under “4. Responsibilities, (E) Directors, Regional Directors, and Managers”:

*(4) Giving visible support and taking an active role in safety activities.*

#### Recommended section in the Guide to include the expectation of visible and engaged leaders

Team 8 also recommends placing leadership guidance in the Guide. While many of the activities presented below are already occurring to some degree within Reclamation or included within other actions, they represent areas where there should be continued focus. The following text is recommended for the Guide:

### ***Leadership Engagement in Safety***

*Reclamation leaders actively participate in SOH activities*

- *Visit field locations (construction sites, field work, etc.).*

- *Participate on safety committees and help develop solutions.*
- *Communicate resolution of identified safety issues to staff.*
- *Individual management teams (regional, area, etc.) discuss how best to engage with staff in relation to safety and how to lead by example, based on policy and training.*

*Reclamation leaders convey clear expectations to all employees*

- *Define expectations around safety goals, policies and procedures, performance expectations, incentives, and consequences.*
- *Communicate expectations to all employees*
  - *Expectations should be documented in a variety of materials, such as the Guide, strategic plans, memos, and training materials*
  - *A variety of forums may be used to communicate expectations in person, such as regional, area, and field office safety meetings; RLT meetings; all employee meetings; management team meetings; site visits; safety weeks; training; and health and wellness fairs.*
- *At a minimum, conduct quarterly leadership meetings at the regional level to reiterate and focus on safety expectations. Agenda items may include review of relevant safety statistics, issues, and safety activities.*
  - *Provide employees a report on the outcome of these meetings.*

*Provide Direction to SOH staff*

- *Regional and Area leaders will hire and retain SOH staff to provide safety support*
- *Leaders and managers will guide SOH staff in maintaining the culture of caring for safety while balancing their roles of consulting to improve safety, reviewing safety, providing safety training, and being available to hear safety concerns from staff*
- *Leaders will consult with SOH staff in relation to identifying, addressing, and resolving safety issues*
- *SOH staff will accompany leaders in some site visits and join with leaders in promoting safety and recognizing safety success*
- *SOH staff will brief leaders on accidents and lessons learned*

### **3.3.3 Implementation**

Many of these activities require little start-up time as they are about getting engaged and messaging safety.

#### **Schedule of Deliverables**

Implementation Activity	Responsible Office	Time Frame
a. Update SAF 01-01	Reclamation Safety and Health Office	3 months
b. Finalize leadership section in the Guide.		6 months

## **3.4 Recommendation 4 – Fully Implement Collateral Duty Safety Officer Program**

Team 8 recommends that Reclamation document and fully implement a Collateral Duty Safety Officer (CDSO) program, as set forth in the Departmental Manual (485 DM 28.3, which uses the term Collateral Duty Safety and Occupational Health Officer) and define parameters regarding how CDSOs should be utilized to supplement safety officers.

### **3.4.1 Purpose and Need**

In discussions with employees, Team 8 found that while there are safety managers and CDSOs at various locations, some managers and employees do not have ready access to a “Safety Person” and do not have a straightforward venue for addressing safety issues in a timely fashion. Reclamation has not developed consistent standards for determining how/where collateral duty safety personnel are utilized, as the Departmental Manual requires. CDSOs can supplement safety officers who do not have the bandwidth to address needed safety issues. Although CDSOs exist in some locations, their roles and training are often not defined well and they may be underutilized.

As background, 485 DM 28.3 states the following:

#### **28.3 Requirements**

- A. Bureaus will establish and maintain a staff of safety and occupational health professionals, both on a full-time and collateral-duty basis, at appropriate levels, to advise management in the development and implementation of an effective safety and occupational health program.*
- B. Each bureau will develop and maintain a written CDSHO program sufficient to satisfy the requirements and intent of applicable Occupational Safety and Health Administration (OSHA) and Departmental requirements as identified in 28.2.”*

#### **Benefits**

Through using a CDSO program with defined duties and responsibilities, safety knowledge will be spread more broadly throughout Reclamation and managers, supervisors and staff will have access to resources to help them improve safety. This will help safety practices permeate Reclamation, demonstrate management’s commitment to safety, and increase employees’ trust that Reclamation addresses safety issues.

### **3.4.2 Description of Actions**

This section contains general policy recommendations as well as the recommendation that a written CDSO Program should be formed, expanding on SAF 01-06.5.G. The intent is that every employee should have ready access to safety staff, and that safety staff will help improve safety throughout Reclamation. Details regarding the program should be developed by the Reclamation Safety Council or a follow-on team to the SOH Action Plan Effort. In creating the program, Reclamation should define a process for creating CDSO positions, create guidance for staffing of safety officers and CDSOs, establish required training, and describe CDSO duties so that they are used in a consistent manner, with flexibility for local needs.

Recommended changes to SAF P01-01, Section 5, changes highlighted:

*B. The Commissioner’s Office and regional offices will employ credentialed SOH personnel (as evidenced by a masters-level or higher SOH-related degree, or current Certified Safety Professional, Certified Industrial Hygienist, or a Professional Safety Engineer certifications) as the senior manager to recommend policy, provide guidance, and evaluate the implementation of the SOH Program. Area offices will also employ at least one credentialed SOH manager. Requests for waivers will be prepared and submitted as required by RCD 03-03. To encourage professional SOH leadership, Reclamation will promote the credentialing of full-time SOH personnel at all levels of the organization.*

**3.4.3 Implementation**

This recommendation should be implemented with the oversight of the Reclamation Safety Council. A team of safety officers, existing CDSOs and managers could perform the work required to document the CDSO Program. This could be performed during the next phase of the SOH Action Plan effort.

**Schedule of Deliverables**

Implementation Activity	Responsible Office	Time Frame
a. Prepare written CDSO program, expanding on SAF 01-06.5.G.	Reclamation SOH Council and assigned team	6 months
b. Finalize policy changes	Reclamation Safety and Health Office, Policy Office	6 months

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## 3.5 Recommendation 5 – Uniformly Implement “Stop Work” Policy and Guidelines

Team 8 recommends Reclamation fully implement and communicate a clear Stop Work policy and guidelines to reinforce the message that employees must have safe working conditions.

### 3.5.1 Purpose and Need

Team 8 received feedback suggesting some Reclamation employees fear adverse actions for stopping work from coworkers and leadership. It should be made clear that since we care about safety in Reclamation, anyone can, and everyone is expected to, stop work to resolve safety-related concerns. This policy may become less necessary if employees become engaged in a collaborative safety culture and ANSI Z10 standards are implemented, but in the interim, it will send an immediate message regarding the importance of safety.

#### **Benefits**

Benefits of a clear Stop Work policy and guidelines include the following:

- Employees would be empowered with the duty to pause work in order to correct safety issues without having a concern over reprisal or adverse action.
- There will be more open communication and empowerment for avoiding and resolving unsafe conditions or activities.

### 3.5.2 Description of Actions

Team 8 recommends the actions described below.

#### Modifications to Directives and Standards Change

Team 8 recommends the following changes to the Directives and Standards:

SAF 01-01.4.C(Managers/Supervisors/Leaders) –insert new item between items 6 and 7:

- *Take appropriate measures to resolve issues contributing to a stop work action by an employee. Ensure that the employee knows there will be no reprisals for stop work incidents. In the case where a resolution cannot be reached in a timely manner, conduct planning to resolve the issue.*

SAF 01-01.4.D (Employee Responsibilities) -insert new item between items 3 and 4:

- *Stop work for an unsafe condition and notify the appropriate person in their chain of command. Work will not resume until the concern has been resolved.”*

#### Guidance to be included in the Guide

Team 8 recommends the following language be included in the Guide to communicate to how stop work actions should occur and be managed.

## Stop Work Guidance

*Reclamation does not compromise its values regarding the safety of its personnel and property. All of us are responsible for providing and maintaining a safe and healthful work environment where all hazards and unsafe acts are identified, analyzed and eliminated. Reclamation has empowered all personnel to “STOP WORK” when they feel that they, a coworker, the public, or property is in danger of being injured, killed, or damaged on the job. Leaders, managers, and employees share responsibility for the safety and safe work conduct of all personnel. All personnel are required to “STOP” any unsafe act, practice, procedure or conditions observed and immediately report it to their supervisor. The required first response to a person stating a stop-work request will be “Thank you.”*

*Supervisors will work with employees to resolve the safety issue immediately if possible. If the issue cannot be resolved immediately, Supervisors will alter activities as needed, then plan and accomplish resolutions of the issue and report back to the employee who initiated the stop work action.*

*A personal commitment to participate in this program is expected and is a key condition to the success of the safety program. There will be no reprisals for safety stop work incidents.*

### 3.5.3 Implementation

The primary implementation activities will be to finalize changes to the Directives and Standards and the content for the Guide. Also critical to the success of this effort will be clear communication regarding the stop work policy and guidelines.

#### **Schedule of Deliverables**

Implementation Activity	Responsible Office	Time Frame
a. Finalize directives and standards changes	Reclamation Safety and Health Office, Policy Office	3 months
b. Finalize stop work guidance for the Guide	Reclamation Safety and Health Office	3 months

## **3.6 Recommendation 6 - Document Accident Follow-up Processes**

Team 8 recommends Reclamation document guidance and procedures to help staff understand the processes required following an accident.

### **3.6.1 Purpose and Need**

In discussions with Reclamation staff, Team 8 found out that trust and cooperation can be eroded very quickly following an accident, based on how the affected employees are treated during the process, and it can be very difficult to rebuild trust. Employees who have been in an accident have perceived undue scrutiny and suspicion by staff that are not part of an accident investigation, but still have a role in the process. Additionally, people performing different processes, such as property surveys or health care activities, often do not know how the other processes work. As a result, employees and managers can experience a range of confusing, uncoordinated information requests.

To maintain trust, it is critical that accident follow-up must be conducted in a straightforward, way that minimizes negative effects on employees overall. If employees feel they or their colleagues are unjustly punished or treated with undue suspicion for reporting a near miss or having an accident (which may or may not have been their fault), they may be reluctant to report near misses or accidents. Underreporting of “adverse events” is a known problem in healthcare settings, where an estimated 50-96 percent of such incidents go unreported in the United States (Barach and Small 2000 as cited by Lawton and Parker 2002). Reclamation is not in the healthcare industry, but underreporting can similarly limit Reclamation’s ability to improve its operations and prevent future incidents and accidents.

While human error is believed to play a major role in 80% of accidents in hazardous environments (Hollnagel 1993 as cited by Lawton and Parker 2002), individuals participating in accident follow-up activities should recognize that humans cannot always be error-free. As part of the safety culture, documenting accident follow-up processes and setting clear expectations for all involved would help provide employees a safe environment to report accidents or near misses; to take care of any injuries or property damage; and to document and share lessons learned so accidents are not repeated. This would create a learning environment to encourage open communication.

### ***Benefits***

Benefits of well documented accident follow-up processes include the following:

- Gives staff and managers a clear understanding of post-accident processes
- Allows for equitable treatment of employees after accidents
- Incident reporting will likely increase; workers appear to be more likely to report behavior that may result in negative outcomes when protocols relevant to the situation

are in place (Lawton and Parker 2002)

- Allows supervisors, HR and safety staff to be proactive in identifying problems and taking steps to prevent them from recurring

### **3.6.2 Description of Actions**

Existing requirements for accident investigation and reporting, including near misses, are outlined in SAF 01-02. Reclamation should document and disseminate consolidated post-accident process guidance for investigation and reporting, boards of survey (a property process), health care, employee discipline, and other related processes. These processes should be documented in the Guide, with additional resources in the safety section of Reclamation's intranet site.

Reclamation's processes for accident follow-up should reflect its culture and values. The approach should include clearly-defined negative consequences for clearly-defined behaviors.

#### Key points related to processes

In documenting processes, key concepts that should be included for building trust include the following:

- Include an after-accident checklist to guide activities and help employees and managers and others involved in the process understand what they need to do and how processes are related to each other.
- Document a clear separation between disciplinary actions and other processes.
- Include guidance that supervisors and HR professionals should follow up in a helpful and courteous manner, making sure to consider the perspective of the person involved in the accident.
- Include processes for communicating information soon after an accident or near miss, and upon completion of investigations, to help prevent other accidents.

#### Training considerations

Accident follow-up should be included in new employee and other safety training. The following concepts should be included in training related to accident follow-up activities:

- The concept that being safe is a developmental process like other job responsibilities, and it is critical that managers invest in this development for employees.
- The difference in process for workers compensation claims and other safety incidents. The difference between accidents caused by negligence and those beyond employee control, and considerations for disciplinary processes. Examples of negligence would include purposely not wearing a hard hat in a construction area.

### **3.6.3 Implementation**

A team convened by the Reclamation Safety Council and consisting of property, human

resources, and safety staff should be assembled to document the processes related to accident follow-up. Once these processes are defined, they should be included in the Guide and the safety section of Reclamation's intranet, as well as being incorporated into safety training.

### ***Schedule of Deliverables***

Implementation Activity	Responsible Office	Time Frame
a. Document post-accident process guidance	Reclamation Safety and Health Office, with HR, Property, and other related disciplines	6 months
b. Include process guidance in the Guide and on the Intranet	Reclamation Safety and Health Office	3 months
c. Include guidance in safety training materials	Reclamation Safety and Health Office, Training Team	3 months

## **3.7 Recommendation 7 - Implement Effective Safety Committees**

Reclamation will implement safety committees within regional offices, area offices, and Denver and Washington counterpart.

### **3.7.1 Purpose and Need**

Safety committees have been implemented for Reclamation as a whole and within regions and some area offices. Team 8 found that their functions could be improved to provide continuous safety improvements and address safety concerns that may be raised at a variety of levels. Through implementing effective safety committees, Reclamation will identify and resolve safety issues at appropriate levels and with appropriate participation - management, staff, union representatives, and other groups as necessary.

### ***Benefits***

Effective safety committees provide the following benefits:

- Provide a venue for collaboration and resolution of safety concerns and issues
- Provide a venue for communicating the status of known safety issues and following up on their resolution
- Provide a forum that encourages two-way communication among different organizational levels and between management and staff to address safety
- Build trust through demonstrated results
- Give people ownership and a chance to participate in improving safety

### 3.7.2 Description of Actions

This recommendation consists of two actions: directives and standards updates (SAF 01-01 and SAF 01-06) and publishing guidance on safety committees in the Guide.

29 CFR 1960, Subpart F and 485 DM 9 discuss the primary roles of safety and health committees, which include the following:

- A. Review the Program and advise the head of their organizational unit of possible ways to improve the Program.
- B. Provide a channel of communication between employees and management to assist management in providing a safe and healthful workplace.
- C. Educate and encourage employees to comply with pertinent safety and health requirements.

The recommendations listed below are based on this guidance.

#### Recommended Update to SAF 01-01.5.B.8

Team 8 recommends adding the following text after the existing text, in order to establish expectations for establishment of safety committees:

*A Reclamation-wide safety committee shall be established. Safety committees shall also be established within each regional office and area office, Denver counterparts, and the Washington Office (WO). Additional safety committees (e.g., at large facilities or field offices) shall be established at management discretion.*

#### Recommended Update to SAF 01-06

The role of safety committees is briefly mentioned in SAF 01-6 (Workplace Safety Inspection and Abatement). Team 8 recommends that Safety Committee Member responsibilities to participate in workplace safety inspections be eliminated, since members may not have the necessary training and experience. The recommended change to SAF 01-06.4.G is as follows:

*Collateral Duty Safety Representatives ~~and Safety Committee Members~~. Collateral duty safety representatives ~~and safety committee members~~ are responsible for:*

- (1) assisting area office safety and health managers with workplace safety inspections as needed; and*
- (2) attending training for hazard recognition and work place safety standards if assisting in or conducting safety inspections.*

#### Recommended information to be included in the Guide

The Guide and associated intranet resources should help safety committees accomplish the responsibilities outlined in 485 DM 9. Team 8 recommends the guidance listed below.

1. Establishment of safety committees

Each safety committee should have a chair and a charter that includes items such as those discussed herein. Reclamation may create a standard charter template, for customization related to individual committees.

2. Membership

Safety committees should include a broad cross-section of personnel and disciplines to foster diversity of representation and perspectives. Membership in the various safety committees should include the following:

- Reclamation wide - Safety manager and one management representative from each region, the Denver Office (DO), and WO.
- Regional (and DO/WO equivalents) - Regional Director or representative, representatives of each main operational entity (area offices, and regional groups), safety professionals, management, and staff from a cross section of disciplines and organizational units.
- Area office - Area manager or representative, representatives of each facility and major organizational unit. SOH professionals, Collateral Duty Safety Officer (CDSO), management, union representation (if the work force is unionized) and staff. Smaller facilities may be represented by other facilities.
- Facility or field office level - Facility manager, CDSO, representatives from work groups, other entities as appropriate (e.g., water districts, on-site contractors).

Safety committees may include contractors or other entities (e.g., water districts, collocated agencies) if they work closely with Reclamation staff on a regular basis or share facilities.

3. Meeting frequency

Safety committee meetings should occur with the following minimum frequencies:

- Reclamation wide - bi-annual
- Regional and area offices, and DO/WO equivalents -quarterly
- Facility/field office - management discretion-minimum quarterly

4. Safety committee activities

While activities of safety committees should be based on needs of the organizational unit, their primary activities should be to discuss and coordinate the resolution of safety issues. At individual facilities, safety committees may also conduct informal safety inspections to identify issues.

Safety committee meetings may include the following activities:

- Identification and discussion of deficiencies and issues
- Discussion of safety feedback received from staff
- Discussion of incidents, near misses and lessons learned
- Follow-up on known deficiencies
- Discussion of developments in safety programs (e.g., information from OSHA,

- new requirements)
  - Assignment of action items to teams
  - Reporting back to facilities/organizational groups
  - Use of the Plan-Do-Check-Act model described in the American National Standards Institute (ANSI) Z10-2012 Standard – Occupational Health and Safety Management Systems - to review and update safety procedures/policies
5. Subcommittees
- Leaders may designate subcommittees or ad hoc teams to work on issues or action items as needed. For example, one area office designated a Safety Action Team to complete a checklist of desired safety improvements. Considerations related to these teams include the following:
- Membership can be flexible and should be representative of operating units and work groups affected
  - Members can be assigned as needed based on actions that need to be addressed
  - Teams could be assembled to work on a specific need if it will take a sustained effort
6. Safety committee logistics
- Considerations related to managing effective safety committees include the following:
- Meeting locations - Safety committees should consider rotating meeting locations to develop a mutual understanding of safety issues in the area covered. Committees may utilize video teleconferencing (VTC) or conference calls to facilitate participation, but in-person meetings are critical for building trust and a team mentality.
  - Meeting duration - Sufficient time should be scheduled for complete discussions. (e.g., a whole day scheduled for area office safety meetings.)
  - Meeting documentation - Minutes and action items should be documented and shared among all staff served by the committee to maintain transparency and accountability.

### 3.7.3 Implementation

Since safety committees are in place in many of Reclamation’s organizational units, implementing this recommendation should be straightforward.

Implementation Activity	Responsible	Time Frame
a. Finalize safety committees D&S sections b. Finalize safety committees section of the Guide	Reclamation Safety and Health Office, assisted by SOH Council, Policy Office	a. 3 months b. 6 months

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## 3.8 Recommendation 8 - Hold Effective Safety Meetings

Team 8 recommends that regular safety meeting should be available to and attended by all employees. This will help employees have common understanding of safety issues and topics.

### 3.8.1 Purpose and Need

Safety needs to be the highest priority of each employee, and safety meetings should be a forum for developing a common safety culture. While the RSHS provides guidance on contractor safety meetings, there is a gap relating to guidance of Reclamation staff safety meetings.

#### ***Benefits***

The primary benefit of general participation in safety meetings is that expectations for the minimum frequency of Reclamation staff safety meetings would be spelled out. Others would be increase communication and active engagement of staff. It would strengthen commitment to a safe work environment as well as build trust around employees, which develops cooperation. Additionally, it would increase knowledge and safety awareness.

### 3.8.2 Description of Actions

All staff are expected to support and participate in required all-hands safety meetings for their own and fellow workers' well-being. Participation in safety meetings will provide each person knowledge and tools to identify and control hazards, recognize and enforce the compliance of standards, and seek out and participate in safety training. In addition, all-employee meetings should include safety information as appropriate.

#### Recommended Update to SAF 01-01.5.B.9

Team 8 recommends updating the existing text with the highlighted text below:

- *Safety and Health Meetings. Conduct regularly scheduled meetings to address safety and health issues concerning employees, facilities, and operations. All employees will be included in a group that holds safety meetings.*

#### Recommended information to be included in the Guide

Team 8 recommends including the following information in the Guide.

1. Meeting frequency:
  - Safety meetings should be held monthly, at a minimum, for all organizational units.
  - Areas where industrial work is performed should have weekly tool box safety meetings. RSHS 3.4.4 extends this requirement to contractors.
2. Elements of effective safety meetings

- Utilize safety professionals as a resource for topics
  - Follow-up from previous meetings and previous action items
  - Current safety issues and actions
  - New concerns
  - Education on a specific safety topic or theme
    - Related to specific projects or general work at the facility (tailored to the audience and their activities)
    - Seasonal safety (heat, cold, fire, lightening, vehicle)
    - First aid and general health (ergonomics, occupational health, wellness, hearing conservation, toxins)
  - Review of recent accidents and near misses
  - Lessons learned
  - Recognition of positive safety actions and/or presentation of safety awards
  - Upcoming safety training opportunities
3. Safety meeting logistics and recordkeeping
- Sign-in sheets and a summary of discussion topics should be kept at each facility for a minimum of seven years.
    - Staff who are unable to attend shall be briefed by their supervisor on the topic presented and shall sign the sign-in sheet as having been briefed
  - Managers may designate a safety coordinator to ensure continuity and relevant topics
  - Meeting responsibilities may be rotated among staff to provide hands-on experience
  - Reclamation may include suggested topics and resources for safety meetings in Safety Factor Newsletter or other materials produced by safety professionals
4. Recommendations for improving safety meetings
- Make them interactive
  - Use a variety of media
  - Invite internal and external guests

### 3.8.3 Implementation

Since safety committees are in place in many of Reclamation's organizational units, implementing this recommendation should be straightforward.

Implementation Activity	Responsible	Time Frame
a. Finalize safety meetings D&S section b. Finalize safety meetings section of the Guide	Reclamation Safety and Health Office, assisted by SOH Council, Policy Office	a. 3 months b. 6 months

### ***Industry Lesson – DuPont***

*The award-winning DuPont™ STOP™ (Safety Training Observation Program) was developed by five DuPont plants and has been used throughout the world by DuPont as well as many other organizations. The objective of the program is to stop injuries by improving safety observation skills and helping people talk with others about safety. It teaches employees to recognize safe and unsafe conditions as well as safe and unsafe acts. STOP™ is based on tested principles that have been proven to reduce incidents and injuries: all injuries can be prevented. Employee involvement is essential. Management is responsible for preventing injuries.*

*STOP™ programs are for supervision and for each other. STOP™ For Supervision is based on the idea that leaders are accountable for the safety of their employees. It builds safety observation and communication skills, enabling constructive discussions with employees about safe and unsafe work practices.*

*STOP™ For Each Other is based on the idea that safety is everyone's responsibility. It is designed to help participants look at safety in a new way, so they can help themselves and their co-workers work injury-free. During the program, participants develop their safety awareness and communication skills enabling them to talk with others about all aspects of safety.*

<http://www.training.dupont.com/dupont-stop/stop-overview-workshops>

## 4. Critical Follow-on Activities

To improve Reclamation's safety culture, the 2014 Reclamation SOH Action Plan identified 21 areas needing improvement, and established 21 action teams to identify implementation activities to target these areas. The success of implementing these activities will both build on and be dependent on trust and cooperation within Reclamation.

As the SOH Action Plan effort moves towards implementation, Reclamation should focus on a few critical items to continue building trust and cooperation and the safety culture, as follows:

- While individual recommendations in this document include time frames, these recommendations and others resulting from the effort should be staged according to relative priority and relationships among recommendations. As a result, the timing of activities will be adjusted.
- Reclamation should build on existing work in the regions to complete the recommendations herein, such as defining and implementing the CDSO program (Recommendation 4) and documenting accident follow-up processes (Recommendation 6).
- Interim and final results of the SOH Action Plan Effort should be communicated Reclamation-wide.
- Individual team recommendations accepted by the RLT for implementation should be planned and tracked, similar to current SOH team activities.
- ANSI Z10 standards, addressed by Team 2, call for continuous improvement in relation to safety. As Reclamation continues to improve its safety approach, it should periodically evaluate progress and needed adjustments.

The range of actions described above will help strengthen trust and cooperation. Establishing a culture of caring is foundational and can set the stage for long-term success of the SOH Action Plan effort. Reclamation should view the effort as a journey, wherein it periodically assesses progress and makes course corrections as needed. Through creating a long-term action plan, Reclamation will set an initial course for long-term improvements in its safety culture and provide an even safer working environment for its staff.

Continued planning and management over the long term will help this be a successful journey.

## 5. Work of other SOH Action Teams Critical to Trust and Cooperation

Some items considered by Team 8 to be critical for building and maintaining trust and coordination are being addressed by other teams. Critical items and that should be included and their benefits are listed below:

- A. Quickly share information on actual incidents to all staff as appropriate (Team 4).
- In discussions with many people throughout Reclamation, Team 8 members found that employees have a great desire to quickly learn lessons from incidents so that they do not repeat them. Being forthcoming with information will help build trust within Reclamation.
  - Reclamation should develop plans for quick dissemination of initial information, in addition to dissemination of final information, once it has been gathered and analyzed.
- B. Develop robust communication strategy (SOH Team 4).
- A comprehensive communication strategy is needed to focus all of the regions, areas, and offices around the common safety vision. Effectively sharing and information will demonstrate competence, while promoting shared understanding and shared objectives throughout Reclamation.
  - This plan should address how various communication tools (Safety Factor newsletter, email, webinars, bulletins) can be used effectively to inform employees on current safety issues.
- C. Publish and communicate a common safety vision across Reclamation (SOH Team 5).
- With a common safety vision that all employees understand, Reclamation employees will develop consistent understanding and objectives in relation to safety.
- D. Improve the safety deficiency tracking system within (DSIS) to address safety concerns identified by employees and safety committees (Team 12).
- Reclamation does not have a mechanism to track resolution of safety concerns or issues generated by employees, or to inform employees about how/whether their concerns have been addressed. Team 8 heard feedback that employees have often mentioned that their concerns are unresolved, or they are not informed of the resolution. Incorporating employee-generated safety concerns into the deficiency tracking system and reporting back on resolution are critical to improving trust by demonstrating character and promoting shared objectives, showing through actions that Reclamation leaders care about improving safety.
  - As Team 12 moves towards recommending upgrades to the current system (Inspection Abatement System-IAS will replace Dam Safety Information System-DSIS), it is imperative that communication back to the employee who raised the concern, as well as to larger groups of employees affected by the change, be included in the new process.

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