



Guidelines for a Robust Safety Culture

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1.0 INTRODUCTION

This Center for Offshore Safety (COS) publication offers guidance describing a robust safety culture by providing:

- A description of specific safety culture characteristics, including the value and purpose of each
- Factors specific to each characteristic that encourage and demonstrate a robust safety culture
- Potential barriers specific to each characteristic that may prevent a robust safety culture

For the purpose of this document:

- The word “safety” refers to health, safety, security, and environmental aspects
- The word “personnel” refers to all persons conducting work in support of offshore oil and gas activities, including employees and contracted individuals

1.1 BACKGROUND

Safety culture, as a defined idea, first appeared in the nuclear industry following the Chernobyl incident in 1986. Although the characteristics, definitions, and factors used to discuss safety culture have changed since then, the core idea—the “aspect of the larger organizational culture, encompassing the organization’s values, beliefs, attitudes, norms, practices, competencies and behaviors regarding safety”¹—has stayed the same.

In 2013, the U.S. Bureau of Safety and Environmental Enforcement (BSEE) published a Safety Culture Policy Statement that defined safety culture as “the core values and behaviors of all members of an organization that reflect a commitment to conducting business in a safe and environmentally responsible manner.”² BSEE also defined nine (9) characteristics as foundational to having a robust safety culture, commonly referred to as the “BSEE 9”; these characteristics are listed below:

1. Leadership Commitment to Safety Values and Actions. Leaders demonstrate a commitment to safety and environmental stewardship in their decisions and behaviors;
2. Hazard Identification and Risk Management. Issues potentially impacting safety and environmental stewardship are promptly identified, fully evaluated, and promptly addressed or corrected commensurate with their significance;
3. Personal Accountability. All individuals take personal responsibility for process and personal safety, as well as environmental stewardship;
4. Work Processes. The process of planning and controlling work activities is implemented so that safety and environmental stewardship are maintained while ensuring the correct equipment for the correct work;
5. Continuous Improvement. Opportunities to learn about ways to ensure safety and environmental stewardship are sought out and implemented;

¹ *Strengthening the Safety Culture of the Offshore Oil and Gas Industry*, available at <http://www.nap.edu/catalog/23524/strengthening-the-safety-culture-of-the-offshore-oil-and-gas-industry>.

² *Safety Culture Policy Statement*, available at <https://www.bsee.gov/sites/bsee.gov/files/bsee-policy-manual-section/internal-guidance/final-safety-culture-statement.pdf>

6. Environment for Raising Concerns. A work environment is maintained where personnel feel free to raise safety and environmental concerns without fear of retaliation, intimidation, harassment, or discrimination;
7. Effective Safety and Environmental Communication. Communications maintain a focus on safety and environmental stewardship;
8. Respectful Work Environment. Trust and respect permeate the Organization with a focus on teamwork and collaboration; and
9. Inquiring Attitude. Individuals avoid complacency and continuously consider and review existing conditions and activities in order to identify discrepancies that might result in error or inappropriate action.

In 2016, the National Academy of Sciences published a report titled “Beyond Compliance: Strengthening the Safety Culture of the Offshore Oil and Gas Industry” with recommendations to industry, regulators, and other stakeholders on how the safety culture of the offshore industry could be reinforced. One of these recommendations was for operators and contractors to regularly and systematically assess their safety cultures as part of their safety management systems (i.e. SEMS). Another of these recommendations was for industry to adopt the nine (9) BSEE safety culture characteristics.

2.0 PURPOSE

The goal of this document is to help define and describe specific safety culture characteristics in more detail. This will help industry understand and align on their purpose, as well as provide a standardized list of key success factors and obstacles that can enable or inhibit a robust safety culture.

These characteristics can be used as criteria against which companies can assess their own safety cultures, and to identify potential improvement opportunities. Regularly assessing these characteristics is important to assure that the organization is creating, keeping, and improving its safety culture. Using a standardized list of success factors and obstacles against which to assess allows for such assessments to be done in a more systematic and comparable way, allowing for a better understanding over time of the safety culture and potential impacts of any improvement activities.

3.0 SAFETY CULTURE CHARACTERISTICS

As stated above, the goal of this document is to help define and describe specific safety culture elements in more detail. The “BSEE 9” listed in the BSEE Safety Culture Policy Statement were used as a basis for selecting the safety culture characteristics covered in this document. These nine (9) characteristics were then reviewed against other safety culture guidance, including internal and external sources. This review helped reassure that an important characteristic was not missing and that the language used in the guidance would match the language being used in the offshore oil and gas industry. Once that assurance was done, the characteristics were evaluated against existing and ongoing work to avoid redundancy and to determine actual industry need. This review showed three (3) characteristics (Hazard Identification and Risk Management, Work Processes, and Continuous Improvement) have been or are being covered extensively in other industry work. Based on these selection criteria, the following six (6) characteristics were chosen:

1. **Leadership** – The commitment to safety and active engagement of leaders at all levels
2. **Respect and Trust** – A work environment where personnel feel that the information they share is respected and trusted as an accurate reflection of the situation
3. **Environment for Raising Concerns** – A work environment that promotes personnel sharing concerns, mistakes, and observations as opportunities to learn and improve without fear of retaliation, intimidation, harassment, or discrimination
4. **Open Communication** – Personnel communicate openly, freely, accurately, and clearly
5. **Personal Accountability** – Personnel hold themselves and each other responsible for their actions
6. **Inquiring Attitude** – Personnel continually review existing assets, conditions, and activities, and question deficiencies that might result in error or inappropriate action

These safety culture characteristics are described in more detail in the following sections. Each section is organized as follows:

- **Description** – a short explanation of the safety culture characteristic and its importance to a robust safety culture
- **Value and Purpose** – a discussion of the “why” of the characteristic, describing how successful implementation and execution of the characteristic can impact the safety culture and business as a whole
- **Success Factors** – specific attributes and behaviors that support and enable the successful implementation and execution of that characteristic
- **Potential Obstacles to Success** – specific attributes and behaviors that can inhibit or prevent the successful use of that characteristic

3.1 SAFETY CULTURE CHARACTERISTIC: LEADERSHIP

Description:

The commitment to safety and the active engagement of leaders at all levels is critical to the development and continual improvement of the organization's safety culture. Their actions set the direction, expectations, and acceptable behaviors of the workforce and influence all aspects of the organization's culture. The maturity of the safety culture and level of organizational engagement is directly related to leadership.

Value and Purpose:

Visible leadership commitment and engagement are the vital pieces in creating and maintaining a robust safety culture, which is key to a high-performing organization. This visible commitment and engagement manifests in many different ways, including but not limited to facilitated leadership site engagements³ to resource allocation and prioritization to the everyday behaviors leaders exhibit.

Leadership includes all who have a leadership role within the organization, regardless of title. While different levels of leadership have different responsibilities and different levels of influence over the safety culture, all levels of leadership have an obligation to build a sense of shared purpose and trust among team members.

Leaders set the example that the rest of the organization will follow. Leadership actions set the organization's priorities, the values which the organization believes important, and the boundaries of acceptable performance. Therefore, having leaders who are truly committed to a robust safety culture will lead to a high-performing organization that is committed to safety.

As leadership actively drives improvements in the safety culture characteristics, all aspects of the organization's culture will improve. A higher degree of respect and trust will lead to better and more accurate communications, which will allow for more effective decision-making. Personnel will feel confident and allowed to ask questions without fear of reprisal, leading to more effective and efficient results. Personnel will also feel a higher degree of ownership, which will enable them to take the correct actions to address concerns, regardless of the impact to other priorities such as production, cost or schedule.

Success Factors:

- Leaders actively promote actions and policies that support all of the safety culture characteristics
- Leaders actively listen and discuss safety concerns, visibly act to resolve issues, and plainly communicate outcomes
- Leaders view incidents and events as learning opportunities to understand how the management system or safety culture may be improved instead of finding who to blame or who made a mistake

³ *Guidelines for Leadership Site Engagement for the Deepwater Industry*, available at <http://www.centerforoffshoresafety.org>

- Leaders react to the message, not the messenger
- Personnel perceive that their safety and the safety of every person is critically important to everyone in a leadership position
- Leaders recognize the human performance aspects of work and accept that most errors are mistakes due to systemic conditions and not malicious intent
- Leaders question the status quo in a manner that creates an environment where it is easy for people to raise concerns
- Safety is a key part of the organization's performance management and talent development methods, and a critical value to its leaders
- Leaders understand the impact that they have and actively monitor, continually reinforce, and decisively act to improve the organization's safety culture

Potential Obstacles to Success:

- Leaders focus on performance indicators that drive behaviors that are counter to the safety culture they are trying to set and maintain
- Leaders treat safety as a separate entity and do not recognize it as being integral to business success
- Day-to-day behaviors and actions of leaders not aligned with leaders' safety messaging
- An environment in which challenges and contrary viewpoints are not encouraged
- Using previous successes as the only predictor of future performance, leading to a false sense of security and unawareness of current risks
- Minimizing the impact of serious incidents or high potential events as one-offs that do not reflect on the safety culture of the organization
- Leaders are not proactive and only address issues that have visible consequences
- A culture of blaming individuals for incidents and events

3.2 SAFETY CULTURE CHARACTERISTIC: RESPECT AND TRUST

Description:

A work environment where personnel feel the information they share is respected and trusted as an accurate reflection of the situation is key to creating and keeping a robust safety culture. This can lead to an environment where personnel are motivated to improve safety, work as a single team, and demonstrate true care and concern for each other.

Value and Purpose

It is important to create an environment of respect and trust in which all personnel feel confident and empowered to contribute their knowledge and opinions. This type of environment lets personnel share information freely without fear of discipline, retaliation, peer pressure, or other negative consequences. This freedom encourages personnel to share accurate information rather than an overly optimistic representation.

Having an accurate and realistic perspective allows for more effective hazard and risk identification and can lead to more effective communication and decision-making. This can help focus on solutions that are reasonable, feasible, and adequate to address the issues, especially for potentially difficult to identify systemic issues. Visibly resolving issues has the additional benefit of increasing trust through the organization that concerns will be addressed.

An environment of respect and trust contributes to a collaborative environment that can lead to improved safety. This type of collaboration contributes to building a robust safety culture by supporting other aspects of culture such as open communication, inquiring attitudes, valuing diverse opinions, and an environment for raising concerns.

Success Factors:

- Leaders do not retaliate, nor do they tolerate retaliation, in any form
- Leaders do not imply that the information they are receiving is not valid
- All personnel recognize the value of accurate and realistic information, even if it's not positive
- Leaders create an environment that actively encourages differing opinions
- Personnel actively ask for and listen to differing opinions and encourage others to do the same
- Reporting systems are used by personnel without need for anonymity
- Systemic solutions can be implemented because accurate information is shared
- Personnel raise issues because they feel a moral obligation to do so

Potential Obstacles to Success:

- Leaders respond negatively to information in a way that discourages further information sharing
- Unexpected or different information is implicitly suspected as not being correct
- Lack of information regarding what actions were or were not taken as result of the information sharing
- Concerns are not addressed in a visible manner

- Personnel do not believe that management will respond or there is a history of management not responding
- Information sharing systems, methods, or requirements are too difficult to use effectively and efficiently
- Too much information being shared, leading to an inability to distinguish key information
- Recognition and rewards programs encourage behaviors that are in conflict with the safety culture that leaders are trying to establish
- A tendency to allow your opinion of another person and the information they may share to be influenced by an overall good or bad impression of that individual (also known as the 'horns and halo effect')

3.3 SAFETY CULTURE CHARACTERISTIC: ENVIRONMENT FOR RAISING CONCERNS

Description:

A work environment that promotes personnel sharing concerns, mistakes, and observations as opportunities to learn and improve is key to keeping a robust safety culture. Such an environment should help personnel feel confident and empowered to share without fear of retaliation, intimidation, harassment, or discrimination.

Value and Purpose:

When creating a robust safety culture, it is important to create an open environment in which personnel can easily raise concerns, mistakes, and observations without fear of retaliation. This is also important building an atmosphere where true care and concern is felt and in running an efficient, high-performing business. This is because the first step in resolving issues is to know that there are issues. This is true whether the issues involve fixing errors, resolving unknowns, settling differences, or making improvements.

However, personnel often think raising issues is daunting and stressful. As a result, some may avoid speaking up. This could cause known problems to become worse and result in more severe consequences. Personnel that are not willing to share information about their work environment will also prevent the sharing of good practices that could provide benefits across the business.

Leaders can help overcome resistance to speaking up by systemically creating a supportive open environment that promotes the sharing of concerns, mistakes, and observations. Their reaction to reporting, especially to bad news, is critical in building this supportive and open environment. Leaders must also be sure that policies, processes, leadership expectations, reporting systems, and reward programs all clearly encourage and promote reporting of this kind of information.

Creating and nurturing such an environment will help the company by developing a culture of information sharing that can lead to the earlier and more efficient identification and resolution of issues. This in turn can help prevent more serious incidents. As this safety culture characteristic become more embedded, it also helps create an environment in which new ideas can be introduced more quickly and implemented more efficiently. Finally, it can help create a culture where true care and concern is felt, improving the respect and trust between the line and management.

Success Factors:

- Leaders visibly and proactively encourage personnel to discuss concerns, mistakes, and observations without fear of retaliation
- Policies, expectations, resources, and recognition are set in a manner that promotes discussion and reporting
- People feel free to raise concerns, mistakes, or observations regardless of reporting relationships
- Personnel actively solicit and listen to differing opinions, and encourage others to do the same
- The boundaries between acceptable and unacceptable behaviors are clearly understood and are the same for everyone

- Concerns, mistakes, and observations are addressed visibly and in a timely manner
- Policies, expectations, resources, and recognition are established in a manner that promotes discussion and reporting
- Anonymous methods of reporting information are available but not needed because leaders create and reinforce an open environment for reporting information and personnel feel free to share
- Concerns, mistakes, and observations are addressed visibly and in a timely manner
- Investigations and analysis are focused on lessons learned, continual improvement, and systemic conditions

Potential Obstacles to Success:

- A lack of clear processes to address concerns, mistakes, and observations
- Personnel are not informed or made aware of actions taken to address concerns, mistakes, and observations
- Inadequate or inconsistent leadership response to concerns, mistakes, and observations
- Leadership responds to success or failures in a manner counter to the safety culture it is trying to establish or maintain
- There is a perception, whether correct or not, that personnel are always blamed for unplanned outcomes, including incidents or events
- Information sharing systems, methods, or requirements that are too difficult to use effectively and efficiently
- Reporting is not perceived to add value to the organization and is seen as a company requirement instead of a good opportunity to learn
- The system is not able to get the relevant information to the right people in a timely manner

3.4 SAFETY CULTURE CHARACTERISTIC: OPEN COMMUNICATION

Description:

An important characteristic of a robust safety culture is a work environment in which personnel are encouraged to communicate openly, freely, accurately, and clearly. This includes actively listening for understanding, encouraging the sharing of diverse opinions, and engaging in constructive debate.

Value and Purpose:

An environment that promotes open communications and sharing of information facilitates continual improvement and more effective risk management. This is because broadly communicating experiences, either individual or shared, help increase the organization's collective knowledge of hazards, responses, and risks. In addition, sharing and constructively debating issues fosters innovation in approach and solutions to issues and helps drive continual improvement. Communication of information alone is insufficient; successful open communication requires acknowledgement that the communication is heard and understood.

Leaders can support open communication by creating a culture that rewards it and does not tolerate situations where information is either deliberately misleading or withheld. In addition, leaders play a key role in the development of more effective and timely information sharing by supporting and allocating appropriate resources for information management and communications.

Industry also can play a role in driving open communications through joint agreements to share safety information broadly, as well as by working to remove obstacles to sharing information between organizations.

Creating and nurturing such an environment fosters a culture of information sharing that can lead to the earlier and more efficient identification and resolution of issues and help prevent incidents.

Success Factors:

- Leaders visibly and proactively encourage personnel to communicate openly with the appropriate stakeholders and provide the necessary resources to support efficient and effective sharing of information
- Information is broadly shared and acted on
- Information management systems allow for targeted communications and acknowledgements that the information is understood
- Industry collectively establishes information sharing methods that allow for the secure collection and dissemination of information to promote safety
- Personnel actively solicit and listen to differing opinions, and encourage others to do the same
- Communication occurs in both directions, including to and from leaders and across teams, individuals, and organizations

Potential Obstacles to Success:

- Legal, operational, and other ramifications of sharing information
- Concerns that shared information will adversely impact personnel

- Leadership responds to success or failure in a manner counter to the safety culture they are trying to establish or maintain
- Inadequate or inconsistent leadership response to communications
- Lack of visibility or awareness of actions to address communications
- Communication systems, methods, or requirements are too difficult to use effectively and efficiently
- Language and cultural disparities are not accounted for when communicating
- Recognition and rewards programs encourage behaviors that are in conflict with the safety culture that leaders are trying to establish

3.5 SAFETY CULTURE CHARACTERISTIC: PERSONAL ACCOUNTABILITY

Description:

Personnel hold themselves and others responsible for their actions, which is key to the successful implementation and improvement of a robust safety culture. This includes understanding the consequences of their actions and achieving their work in a way that emphasizes the importance of safety in delivering desired results.

Value and Purpose

A robust safety culture is one where everybody feels personally responsible for their actions, including the consequences of those actions. This includes a willingness at all levels to raise concerns, disclose mistakes, and work together to respond to and resolve issues. This becomes a positively-reinforcing cycle, as issue resolution encourages more error-reporting, which in turn can help organizations identify issues earlier, before they lead to more serious consequences.

A culture of personal accountability also encourages workers to feel a higher degree of ownership of their job responsibilities, as they feel individually and directly accountable for their performance and results. This feeling of ownership can lead to improved performance as personnel better understand and become more invested in their work.

A culture of personal accountability also leads to an improvement in teamwork, as personnel are more invested in the success of their job, and team success is seen as a natural outcome of individual success. Challenges, questions, and work stoppage are also more welcome as contributing to team successes, as these types of actions help identify issues and solutions earlier.

Success Factors:

- Leaders do not retaliate, nor do they tolerate retaliation, in any form
- Leaders do not imply that information they are receiving is not valid
- All individuals recognize the value of accurate and realistic information, both good and bad
- Personnel actively solicit and listen to differing opinions and encourage others to do the same
- Clear performance expectations and accountabilities are established and understood by all personnel
- Reporting systems are actively used by personnel
- Solutions are focused on systemic issues

Potential Obstacles to Success:

- Failure to establish a sense of empowerment within the organization
- There is a perception, whether correct or not, that leaders do not hold themselves and/or other personnel accountable
- Personnel do not demonstrate care and concern for their responsibilities
- Confusion about roles, responsibilities, and accountabilities
- Inadequate or inappropriate resources provided to personnel to achieve their work

- Personnel do not believe that management will respond or there is a history of management not responding
- Too many responsibilities assigned to individuals
- Lack of involvement by the personnel who have to carry out the safety processes and programs
- Recognition and rewards are contrary to the safety culture leaders are trying to establish and maintain

3.6 SAFETY CULTURE CHARACTERISTIC: INQUIRING ATTITUDE

Description:

An inquiring attitude is to learn by seeking knowledge by asking questions based on the manner or way one thinks about, behaves toward, or feels toward someone or something. Individuals with inquiring attitudes continually review existing assets, conditions and activities, question deficiencies that might result in error or inappropriate action, and help the organization avoid complacency. This characteristic is key to a continually improving safety culture.

Value and Purpose:

An inquiring attitude is important to better understanding the work, identifying improvement opportunities, and resolving issues early to prevent incidents or events. As this is a characteristic that is not always inherent, organizations should focus on developing, encouraging, and enabling an inquiring attitude, and building the confidence to question.

Leaders can create an environment where inquiring attitudes thrive by recognizing those who question and raise safety concerns, who are curious about the work, and by responding in a timely manner. In addition, leaders can create an environment in which all personnel are encouraged to ask questions about their job, the work, and the work around them in an effort to learn more.

Leaders can also support training on building inquiring attitudes by showing up at events, communicating and celebrating real questions and responses, and leading by example.

Success Factors:

- Education and training develops and enhances an inquiring attitude
- Inquiring attitudes are encouraged in all aspects of the business from access or acquisition to divestment or decommissioning
- Leaders monitor for and act on weak signals or early indicators
- Incident and event information is evaluated to find weak signals or early indicators that may be precursors to a more severe incident
- Personnel are situationally aware of what might go wrong and challenge the status quo
- High risk activities, assets, barriers, and procedures undergo constant scrutiny
- Questions raised are responded to promptly and action is taken where required
- Individuals are recognized for their inquiring attitudes when questioning existing assets, conditions, and activities
- Leaders recount stories of successes and failures where an inquiring attitude was key to the success or failure

Potential Obstacles to Success:

- Inquiring attitudes are not recognized as a core skill by the organization or leader within the organization
- No education or training around inquiring attitude

- Leaders focus on responding to questions around minor safety concerns and risk instead of major safety concerns and risk
- Inquiring attitudes are considered a nuisance and individuals are directed to accept the existing assets, conditions or activities
- Questions from inquiring attitudes are ignored or not responded in a timely manner
- Leaders fail to recognize those with inquiring attitudes