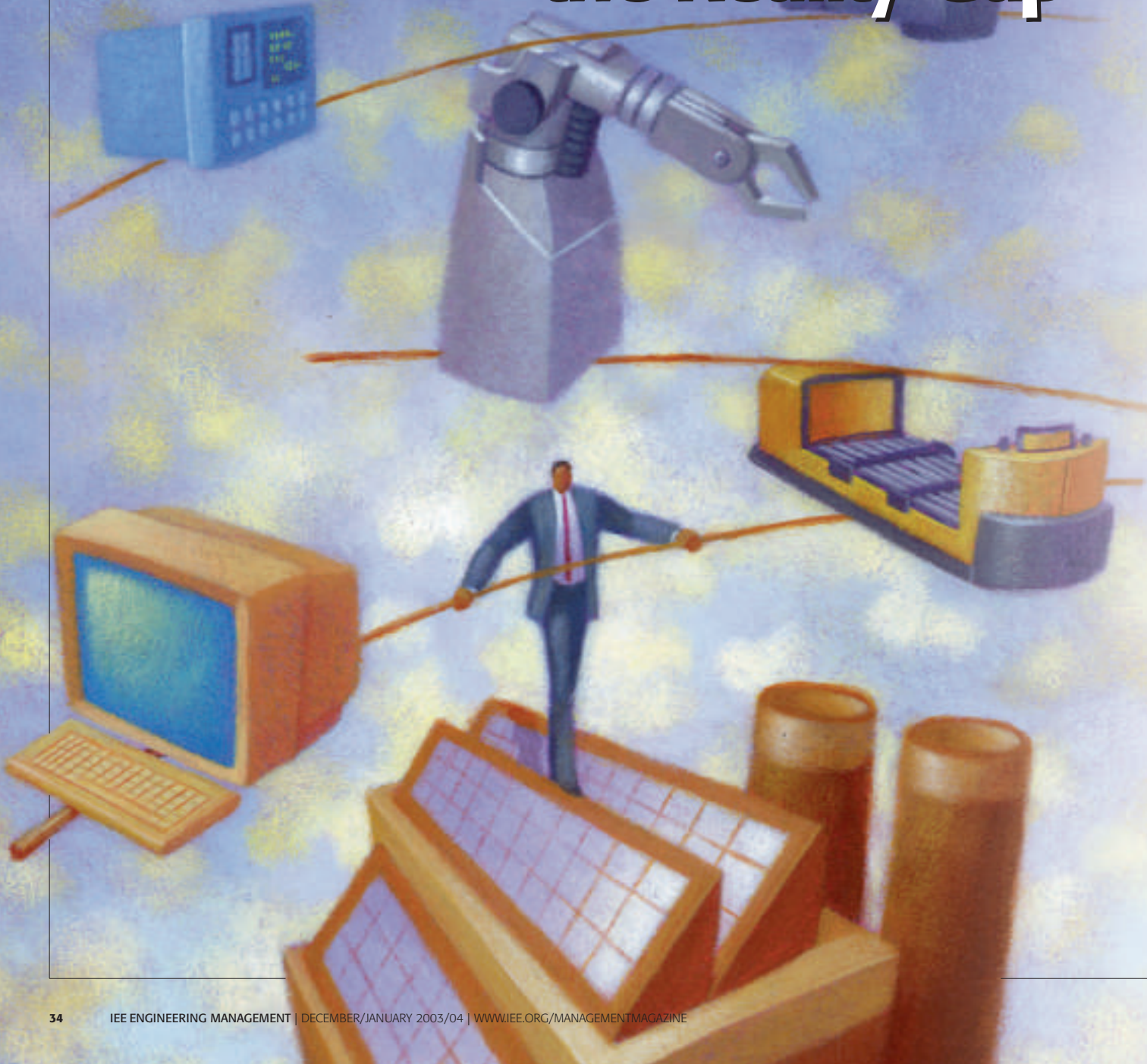


THE INCREASING BURDEN OF SAFETY REGULATIONS AND STANDARDS POSES A REAL DILEMMA FOR MOST ORGANISATIONS. **HARVEY DEARDEN**, AN ENGINEERING MANAGER AND CONSULTANT, WORKS THROUGH THE CHALLENGES.

# B Safety Management: Beware the Reality Gap



The question is how best to address the increasing burden of safety regulations. One approach is to throw money at the problem until it (apparently) goes away. This is likely to involve extensive use of consultants and contractors. The ‘apparently’ proviso is prompted by the possibility that the external resources used may not be entirely competent, or may in good faith introduce measures that are inconsistent with the client’s circumstances.

There is a danger here of ‘management by abdication’, which is in effect no management at all. It should be recognised that consultants do not have the same motivation to keep things as simple as possible. There is also the risk that your own people may ‘over egg the pudding’ in order to further their own standing within the company. Many an empire or reputation has been built on somewhat spurious grounds.

It should also be recognised that unquestioning, wholesale implementation of standards may inadvertently increase risk in some respects. The introduction of impractical measures may weaken the wider credibility of management systems and lead to poor compliance, or divert resources from areas where there may be more pressing needs that might give a better return in terms of safety. If a ‘reality gap’ is perceived between what we say and what we do, or what we do and what we need, the whole safety culture within an organisation is undermined. Safety measures must be understood to be commensurate with the risks if credibility is to be maintained.

## EFFECTIVE IMPLEMENTATION

Better not to issue a directive if you are not minded to ensure it is implemented. Many are tempted to issue a procedure or instruction or put up a sign, without any real commitment to effective implementation, presumably in the belief that this will provide a defence against any charge of negligence. That it will, but not one that is likely to stand if accepted custom and practice allows routine violation.

I distinguish here between regulations that must be complied with if an operation is to remain on the right side of the law, and which the regulatory authorities have a duty to uphold, and standards where compliance is not mandatory but is said to represent best practice.

The regulatory authorities would do themselves a disservice if they failed to recognise the realities of individual circumstances and simply insisted on compliance with the letter as well as the spirit of pertinent standards. The law of diminishing returns applies, and besides the possibility of tying up resources that could be better directed, there is the possibility that strict compliance may produce a less robust solution, that is more susceptible to breakdown.

There is usually a trade off between rigour and robustness in administrative practice. The optimal solution, that produces the best overall safety performance, may not be the same as one that is nominally entirely compliant.

That is not, of course, to say that inconvenient or difficult provisions should be disregarded; rather it is provisions of marginal benefit that require unwarranted resources that should be challenged. The test is whether it is foreseeable that any deviation could significantly contribute to the likelihood or severity of an incident.

## A PRAGMATIC APPROACH

The need is for a suitably pragmatic approach. This may well mean that implementation is not completely compliant in every particular with regard to a given standard or set of guidelines. The standards are normally generic in nature, in order that they may have the widest applicability; some interpretation and intelligent discrimination is often called for. Most modern regulatory developments are based on a risk assessment of potential hazards and it is appropriate to extend this approach to implementation of the standards themselves.

The standards are usually written in ‘legalese’ to avoid any ambiguity and prevent the irresponsible from wilful misinterpretation that complies with the letter but not the spirit of the content. An unfortunate side effect is that it discourages flexible but responsible interpretation by those anxious to do the decent thing. It is the user who must come to a considered view of what is appropriate. If any external party is consulted it is almost inevitable that they will simply reiterate the formal line.

A good example of where unwarranted rigour may actually compromise safety is in the management of change. An entirely rigorous approach may look good on paper, but if it is overly cumbersome, compliance, particularly out of hours (e.g. nights, weekends), may be poor. Systems that are perceived to be unduly burdensome actually promote short cuts and may well result in a net loss of safety.

There is a danger that EHS management may preach such systems from an ‘ivory tower’, thinking that they have thereby demonstrably discharged their responsibilities, but a failure to address any reality gap may mean safety is actually compromised by the ‘improvement’. It is important that EHS management is effectively integrated into the overall business management to the extent that it shares ownership of the problem as well as the solution. Equally, production, maintenance and design management must recognise their responsibility for closing the reality gap from their end.

The challenge for those in engineering management is to identify a considered, systematic approach effectively tailored for the specific circumstances. This takes real skill, insight and diligence; it is also what makes the job interesting. Simply quoting the rule book is an abdication of professional responsibility. ■

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