

Competence management: over egging the competence pudding?

HARVEY DEARDEN DISCUSSES THE RECENT GUIDANCE POLICY DOCUMENT DEVELOPED BY THE HSE

The Health and Safety Executive (HSE), in collaboration with the British Computer Society (BCS) and the IET, developed a draft guidance document, 'Managing competence for safety-related systems', and invited comment during a public consultation, which ran until the end of February 2006. The final document is scheduled for publication in September 2006.

The draft is an impressive edifice, comprising 66 pages in total. No right-thinking individual can reasonably dispute any individual clause, but taken in aggregate the whole becomes somewhat daunting.

I can see how this comes about; you start with a simple premise and build logically, each step, each additional principle and consideration flowing inexorably, indisputably from there. The structure is entirely self-consistent and rigorous, but somewhere along the way it becomes so very much more than simply fit-for-purpose.

There is a real need here to occasionally look back to the starting point, consider where your logic has carried you and whether your position remains sensible in terms of the ultimate objective of your mission. It is entirely possible for a construct to be logical and yet not sensible, because it is no longer well aligned with your mission or the context of your business.

I am confident it is possible to keep faith with the guidance (as with many standards) in a relatively straightforward manner. Personally, I would like to see the guidance distilled into a much simpler document with a simpler model for wider generic 'consumption'. This is likely to facilitate take-up and implementation; the results may be less rigorous, but the more expedient approach is likely to make a bigger contribution to safety across industry.

Many will be inclined to seek support from consultants, but, in attempting to button down every last aspect with complete rigour, in fulfilment of actual or perceived contractual obligations, there can be a tendency towards over-elaboration. The focus should be on 'fitness-for-purpose' and 'prudence' rather than 'complete rigour'.

Another danger is that companies will try to place themselves beyond possible criticism, and require all sorts of certified assurances in matters of supply/recruitment etc. The 'benefits' may be quite illusory and place unwarranted burdens and unduly restrictive constraints on

business. Intelligent rather than unthinking compliance is needed.

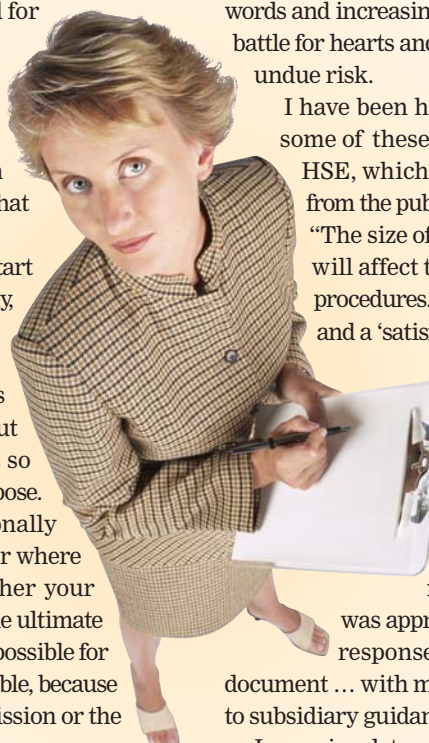
For most enterprises the best safety return will come from improved awareness and implementation of simple, effective work control methods. Overly elaborate provisions are more likely to prove fragile in practice. Ever more words and increasingly rigorous models will do little in the battle for hearts and minds, which is the key to the war on undue risk.

I have been heartened by an acknowledgement of some of these concerns in a recent paper from the HSE, which discusses some of the issues arising from the public consultation over the draft guidance: "The size of an organisation and its undertaking will affect the necessary extent and formality of procedures. Rigour and formality are not the same and a 'satisfy the system' mentality, e.g. in terms of plentiful documentation, that loses sight of the objectives of the Competence Management System (CMS) is very unhelpful for all concerned.

"Several commentators noted that... the amount of detail provided in the recommendations was over-facinating and the default or 'full majesty' was appropriate only to a large organisation. In response to this, we intend to restructure the document ... with much of the existing material relegated to subsidiary guidance."

In passing, let me just note that, although size may well correlate with appropriate extent/formality/detail, there is not necessarily a direct relationship here. It is conceivable that a large organisation could have quite simple requirements. Just another example of how implicit assumptions can unintentionally distort responses.

The restructuring may well help reduce the inadvertent over-elaboration of schemes, but I fear it will not prevent 'over egging of the pudding', by those that bring an inappropriate mindset to the issue or who are motivated by self interest rather than business need. Beware. ■



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The consultation document can be found at www.hse.gov.uk/consult/condocs/competence.htm
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