



Beware Behavioural Safety!

Workers Uniting opposes the use of any scheme that 'blames the worker' for injuries, illnesses and fatalities in the workplace. The main cause of work-related injury and illness lies in the failings of the management of health and safety, not in the failings of workers.

Behavioural safety is the name given to a variety of management programmes that focus on worker behaviour as the main cause of injuries and accidents at work. These programmes presume that if workers just work carefully enough, wear their personal protective equipment and follow safety rules, job injuries and illnesses will not happen.

Behavioural safety programmes ignore the key role that workplace hazards and hazardous conditions play in injury/illness causation. Many behavioural safety programmes are designed in ways that undermine trade union activity on health and safety decrease the role of joint health & safety committees and shift the blame for accidents and poor health & safety from management to workers.

Workers Uniting knows from the experience dealing with health and safety in tens of thousands of workplaces that hazards and unsafe conditions cause injury and illness. When the hazards are properly identified and addressed, workplaces are healthier and safer and injuries and illnesses (not just their reporting) decrease.

Types of behavioural safety programmes and things to watch out for:

- Prizes and reward schemes tied to no or low injury reports or lost time accidents
- “Inquisitions” and disciplinary action for involvement in incidents, accidents, injuries or illnesses
- Worker observation schemes that involve workers or union safety reps watching co-workers and noting down whether they were performing “safe” or “unsafe” behaviours
- The focus of health and safety in the workplace shifting to whether or not workers are wearing their PPE or “lifting properly”
- The focus of health and safety in the workplace shifting away from designing out hazards, implementing engineering controls, addressing ergonomic hazards, and reducing work organization hazards (such as understaffing, production pressures or extended working hours).
- Workers afraid to report incidents, injuries, illnesses and accidents.

What is the real answer to tackling health and safety issues?

- Full recognition of the Union, union safety reps, union health and safety committee members and their full involvement with all aspects of health and safety in the workplace.
- Robust hazard identification and proper risk assessment processes that find and correct workplace hazards and unsafe/unhealthy conditions.
- Recognition of the full range of hazardous conditions to address, including biological, chemical, ergonomic, physical, psychological, work organization and safety hazards
- Correct use of the widely accepted suite of hazard controls (also known as the hierarchy of controls) to address hazards – which mandates elimination of hazards and engineering controls over less effective methods such as personal protective equipment
- Joint Accident/Incident/Near Miss investigations that identify root causes for correction and acting upon recommendations which eliminate the hazards
- Workers’ rights to identify hazards and report incidents, injuries, illnesses and accidents without fear of retaliation or reprisals
- The right to refuse to carry out unsafe work without fear of retaliation or reprisals
- Full reporting and recording of all injuries, illnesses and near misses
- Regular evaluation to ensure effectiveness of programmes and processes in hazard identification and elimination, reduction and prevention

Workers Uniting safety and health reps need to be involved in all decision-making processes around health and safety so that they can bring their expertise to any discussions on what is needed to improve workplace health and safety. It is important that workers and unions achieve the fundamental goals of the union – achieving safer, healthier and more hazard-free jobs and workplaces.

Behavioural Safety Does Not Fit the Legal Framework

Health and safety laws in the countries where Workers Uniting members live and work put the burden of providing a safe and healthful workplace where it belongs – on the employer, not on workers or their behaviours. These laws do, however, provide workers and unions with the right to participate in safety and health.

Under UK law, hazards must be identified through a risk assessment and any risk removed or reduced 'as far as is reasonably practicable'. In reducing risk an employer has to go through a widely accepted suite of hazard controls which consider elimination and engineering controls before less effective solutions such as PPE, training and safe working procedures. These 'General Principles of Prevention' come from a European 'Framework Directive'. It states that employers must begin by avoiding risks. Those that cannot be avoided should be evaluated and combated at the source - that means reducing them and introducing safe systems of work. It also says that 'collective protective measures (have) priority over individual protective measures.'

Behavioural safety turns this process of hazard identification and hazard control on its head. It ignores the identification and proper correction of hazardous workplace conditions, and emphasizes PPE and safe working procedures as the main ways of preventing injury. Because of this, many pure behavioural safety programmes do not conform to UK or European law.

In Canada and the United States, regulators generally require employers to identify, evaluate and control hazards. While regulatory requirements differ by region and industry, requirements for mitigating hazards support the use of the hierarchy of controls. Schemes that blame workers violate not only the intent of these requirements, but, in some cases, the letter of the law. For example, in the United States, the Occupational Safety and Health Administration (OSHA) prohibits employers from discriminating against workers for exercising rights to report job injuries and illnesses. Thus, employer schemes that withhold prizes or threaten or deliver punishment to workers who report injuries have been seen as evidence of illegal discrimination against workers for exercising protected rights.

Fix the hazards – don't blame the workers

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Leo Gerard
USW International President

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Len McCluskey
Unite General Secretary