Understanding the Safety Management Cycle Mike McDonal, Director of Regulatory Compliance Saucon Technologies, Inc.

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What is the Safety Management Cycle

- A six part system that measures the management of all aspects of your safety programs and it's performance
- One of the investigative methods of the Compliance Investigation
- The cycle will be used to cite the deficiencies within your operation

Compliance Investigations

- Are in fact investigations and not reviews
- The investigative process is thorough and multifaceted
- One item that is not compliant can lead to others being investigated and additional citations, fines and operating authority challenges may follow

Policies and Procedures

- This is where it all starts
- Do you have policies and procedures in place that cover all of the aspects of your operation and safety performance
- This includes drivers, operations, sales, maintenance, etc.

Company Policies

- Can be more strict than laws and regulations
- Cannot be less than the laws and regulations
- Will become the standard you will be held to in an investigation
- Don't discount the mundane or the "they should know about that's"
- Have a policy that is clear, concise and current to your operation
- When did you last update your policies
- How do you distribute them and administer them to your employees

Company Policies

- Do they pass the "test"
- Favorite driver scenarios
- They must be consistent among all of your employees
- Do you have a discipline policy that relates to your policies
- Is that consistent as well
- Set the expectation

Company Procedures

- Who is responsible for the creation and maintenance of them
- How many people are trained and proficient in each task
- Don't leave yourself with a single point of failure
- Do you have procedures for all of your day to day activities
- These procedures are for everyone in your organization
- Are they documented
- How are they used in training
- How often are they updated
- When do they need to be updated or at least reviewed

Employee Roles and Responsibilities

- After the development of the policies and procedures they can be separated by function and task to build job descriptions
- These are critical in your organization's success
- How do you develop a role
- How much is too much
- Are all of your bases covered
- How can you be sure all of the responsibilities are being covered

Employee Roles and Responsibilities

- Do you have any conflicting roles
- Safety, dispatch, maintenance, sales, HR, ownership
- How do you address them
- If there is a breakdown in the roles and responsibilities the investigator will ask who is responsible for that task
- They may conduct a personal interview with that employee(s)
- They will ask about the processes in place and the training they received to accomplish the task

Qualification and Hiring

- Hiring is not just about drivers, but all employees
- What is the process
- How long does it take
- Who is responsible for the process
- Who makes the offer

Qualification and Hiring

- This is a critical step in the investigative process
- Driver qualification is reviewed heavily
- So is mechanic and technicians as well
- Do you have a list of qualifications for each position in your organization
- When you built your job description did you consider the qualifications as well
- Who creates the qualifications

Training and Communication

- Training is an ongoing process
- Onboarding is not training
- Training is training
- Initial employment
- Annual recertification
- Addition of new equipment
- Remedial training after an incident

Training and Communication

- Communication as well needs to be a continuous process
- What do we want and need to communicate
- What are the best means to do so
- How do we know the messages are received
- The employees that work for us the least are the ones that need to know the most and be the most up to date
- Newsletters
- Safety meetings
- Messages in driver orders
- Company website
- SLACK channels

Training and Communication

- Messages to all employees
- Many positions overlap in the organization and need to be aware of changes in other departments as well

Monitoring and Tracking

- Tracking is different than monitoring
- Tracking includes data samples, reports and actions taken
- If you just look at something and let it go without further review and recording the data into a report it will definitely lead to problems
- No one expects a significant incident but if one does occur you can't go back and recreate what steps you may have taken in the past

Monitoring and Tracking

- This is a critical part of your success
- There is so much data available to you what do you look and how often
- Many companies only look at something after an incident has occurred
- This may be too late
- What you don't look at could be more costly than what you do find

Meaningful Action

- The final step is simple yet the most needed
- In all of the 5 previous steps when you found something to be deficient what did you do
- Did you document it
- Where did you document it
- If it's not in writing then it never happened according to an investigator
- Action is action but is what you did meaningful

Meaningful Action

- What difference did that action make
- In what way was it meaningful
- Did it create a new policy or procedure
- Did it find the need for a new training segment
- Did our hiring process miss a step
- How has the process or meaningful action improved since it's inception

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QUESTIONS

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