

Implementing Golden Rules

Serious injury and fatality
prevention

“Serious Accident Prevention” discussion group

*Publication coordinated by Michel Descazeaux,
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and Damien Santa-Maria*

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SEVESO, Bhopal, Enschede, AZF, Fukushima... we can all recall examples of accidents or incidents that had a major impact on the environment, devastated families, or jeopardised the economic activity of a particular area.

Given the technical complexity of the subject, the challenges associated with safety, and territorial development imperatives, all stakeholders need to play an active role in the risk management process.

Progress in industrial safety must come from all actors, which is why it is crucial for them to acquire and develop a true safety culture.

That is the mission of the **Institute for an Industrial Safety Culture (ICSI)**, a French non-profit organisation founded in 2003. ICSI is the fruit of a joint initiative between industrial companies, academics, researchers and regional/local authorities working together to:

- ▷ improve safety in companies by taking into account all aspects of industrial risk: technical, organisational and human,
- ▷ promote open and participatory debate between high-risk companies and civil society, through better risk management “education” and safety improvement,
- ▷ encourage all members of society to become familiar with the problems surrounding risks and safety.



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This *Cahier* presents the findings of the ICSI “Serious Accident Prevention” discussion group after two years spent investigating this subject. Michel Descazeaux, Jean-Claude Rébeillé, Camille Brunel and Damien Santa-Maria coordinated its publication.

About the authors

The authors of this *Cahier* are part of ICSI’s “Serious Accident Prevention” discussion group. This group includes representatives of industrial companies from various sectors, as well as trade unions and researchers. It was launched officially on 30 October 2014.

About the coordinators

Michel Descazeaux, Jean-Claude Rébeillé, Camille Brunel and Damien Santa-Maria from ICSI’s consultancy team coordinated the discussion group’s work. They are experts in safety and in human and organisational factors.

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Preface

Until now, when asked about their safety performance, it was rather common for a company to answer by flaunting their incident rate (the number of accidents reported per million hours worked). Undeniably, over the last ten years, the resources devoted to safety combined with constant continuous improvement efforts have generally resulted in a marked and steady decrease in the overall number of accidents. Yet, a more detailed analysis of this trend often also reveals a paradox: over the same period, the number of serious or fatal accidents tends to stagnate or, at least, not drop as quickly as the number of more minor accidents.

This finding is a reminder that a shared awareness of the most significant risks remains an essential attribute of a more effective safety culture. For those working in prevention, it also gave rise to a great need to discuss and reflect on the specific issue of serious and fatal accidents.

For more than two years, the discussion group formed to focus on this topic gathered managers from companies and institutes, as well as trade union representatives. This Cahier presents part of their work, focused on the conditions influencing the effectiveness of Golden Rules (also sometimes called “life-saving rules” or “fundamental principles”), an approach widely chosen to prevent serious injuries and fatalities.

This Cahier aims to shed some light on the different stages of such an undertaking. It presents the experience of several companies and of the various discussion group members, the results of the group’s work and the first-hand experiences collected. This document can therefore assist with implementing such an approach or confirm the suitability of any efforts already under way.

I would like to thank everyone who contributed to creating this Cahier.

I firmly believe that in doing so they are helping to push ideas forward and encouraging us to take decisive action to reduce serious and fatal accidents. This is, after all, an ongoing priority for all ICSI members.

Toulouse, 13 November 2017

Ivan Boissières, General Manager of ICSI

Preamble

With a view to assisting companies in their fight against serious injuries and fatalities, ICSI set up a discussion group focused on “Serious Accident Prevention”. The meetings held by this discussion group revealed that where the prevention of serious injuries and fatalities is concerned, companies should invest in four areas:

- ▷ implementing a small set of simple, unbreakable rules that apply to everyone;
- ▷ improving client company/contractor company cooperation;
- ▷ paying attention to precursors and addressing them;
- ▷ establishing and monitoring performance management and evaluation indicators.

The findings that emerged from the discussion group’s meetings are summarised in a set of publications included in the *Cahiers de la sécurité industrielle* collection.

This first *Cahier*, entitled *Implementing Golden Rules*, looks at how the Golden Rules are chosen, communicated, implemented, supported and enforced at the sharp end so that they may contribute effectively to preventing serious injuries and fatalities.

The Golden Rules are sometimes called “cardinal rules”, “fundamental rules” or “life-saving rules”. The premise for this project is the same, namely that by complying with these rules strictly and rigorously workers will avoid exposing themselves to situations which pose serious risks or could even be fatal (explosion, electric shock, fall from height, lack of oxygen, crushing injury, chemical splash, etc.). Moreover, and bearing in mind that the extent to which the root causes were analysed is unknown, it is worth noting that companies often identify the failure to follow one or several Golden Rules as one of the direct causes of serious and fatal accidents. In fact, these incidents often require a more detailed analysis.

In most cases, these Golden Rules are established by looking at the company’s incident history and identifying the accidents or near-misses with a high serious injury and fatality potential (SIF). The Golden Rules are then implemented within the company. This implementation is very often accompanied by a major communication campaign and is supplemented by toolbox talks, safety reviews and monthly meetings or other practices. As for Golden Rule compliance monitoring, practices seem to vary greatly from one company to the next, ranging from very occasional monitoring to much more regular monitoring via supervision, safety visits, and on-site debriefings. Finally, many companies that have implemented Golden Rules have adopted a just recognition and sanctions policy for reacting to cases of compliance or non-compliance with the Golden Rules, to reinforce their application.

It is therefore important to look at why the choice of these rules and the way they are implemented and monitored are crucial to ensuring they are as effective as possible. This was, in part, the focus of the “Serious Accident Prevention” discussion group which, over more than two years, gathered some 50 participants from industrial companies, trade unions, and research institutes specialising in safety-related matters.

Toulouse, March 2017

Camille Brunel, Michel Descazeaux, Jean Claude Rebeillé and Damien Santa-Maria

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ICSI would like to thank the following people, who contributed to the creation of this document by participating in the debates that took place within the working group, sharing their experiences, and getting involved in the writing phase.

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This *Cahier de la sécurité industrielle* industrielle has benefited from the comments and suggestions made by:

- ▷ ICSI's internal teams, including the consultancy and expertise divisions for Europe:
- ▷ Ivan Boissières and François Daniellou.

ICSI's board and committees

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Michel Descazeaux, Jean-Claude Rébeillé, Camille Brunel and Damien Santa-Maria coordinated the various stages of the working group discussions and the drafting of this *Cahier*.

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Introduction

This document

This document is the first instalment in a series of *Cahiers de la sécurité industrielle* created to help companies wishing to make major progress in reducing their number of serious injuries and fatalities (SIF). It aims to provide some simple principles, the perspectives of safety experts and specialists, and examples of industrial practices that can be transposed into each company's specific context.

This *Cahier* summarises the exchanges that took place during the discussion group meetings, as well as good practices shared by the group's members. It also takes into account the results of an in-depth study involving a dozen companies that have implemented Golden Rules. It is intended for the top management and employees of companies where serious injuries and fatalities occur. It aims to help companies elaborate and implement their Golden Rules for maximum effectiveness.

It is important to remember that when it comes to safety nothing is set in stone; operational experience feedback can gradually enrich current thinking and ideas to improve serious injury and fatality prevention. You might say that this is one of ICSI's Golden Rules.

Its target readership

It is primarily aimed at the top management of companies, but more generally it can be of use to individuals in the following positions:

- ▷ Managers;
- ▷ Executive Committee members;
- ▷ HSE departments;
- ▷ Secretary or member of the health and safety committee.

Golden Rules: what do we mean?

Golden Rules

Definition

Golden Rules are rules that aim to prevent the major risks associated with a company's activities. They must never be broken or bent.

These are the main characteristics of Golden Rules:

- ▷ They save lives if they are strictly followed;
- ▷ They apply to everyone and are common to everyone;
- ▷ They are unbreakable and non-negotiable;
- ▷ They are easy to remember, simple, and can be understood by everyone;
- ▷ They are elaborated using a participatory approach to ensure they are suited to the different work contexts.

These Golden Rules also impose a two-pronged obligation: sharp-end workers, company employees and contractor companies are obligated to follow them, but they must also be able to invoke them to justify a refusal to work in a hazardous situation.

Finally, these rules must be explicitly stated in documents. All relevant actors, including the employees of external companies, must be taught these rules during the training or onboarding process.

Why the interest in Golden Rules?

Golden Rules result from the will of companies' top executives. They choose to implement a Golden Rules approach to focus the attention of all company employees on work practices and/or behaviours which can lead to situations with a high potential for serious injuries or fatalities (SIF), in order to better prevent these. Their limited number reduces the proliferation of rules and principles covering the same themes: the fewer the rules, the easier they are to learn and apply.

Golden Rules are intended to eliminate the most serious accidents. It would appear that their number, themes and content must meet a number of criteria. For example, if there are too many Golden Rules the likelihood of employees actually applying them is significantly reduced. Consequently, Golden Rules cannot be exhaustive and cannot aim to address all risky situations that could lead to a serious injury or fatality. They are primarily chosen to mobilise company employees on those which seem the most frequent and where there is the highest cause for concern given the company's activities. Too often, a large number of serious accidents seem to be due to non-compliance with essential measures which are implicitly or explicitly covered in Golden Rules. This leads us to be highly attentive to all the causes that lead to these transgressions. Therefore, choosing the rules is not enough. All the right conditions need to be in place if they are to be 100% effective at preventing serious injuries and fatalities.

Furthermore, experience in implementing Golden Rules has revealed several times that they did not have a sufficient influence on employee practices. Indeed, too often they are seen as additional rules, just for show, a "cover" enabling the company to "protect" itself in the event of an accident, or even as the latest trend, a top management whim. Because they are kept short and simple, they can seem inadequate and unsuited to the reality of the pressures faced by operational staff, such as those stemming from issues with head counts or equipment, problems between departments, and relations with contractor companies. In this respect, the consultation process leading to their choice and formulation is important, as it helps to increase their credibility and minimise "they come from the top" type reactions.

There is no set, one-size-fits-all method for choosing the very best Golden Rules, nor is there a way to guarantee that they will be successfully implemented and truly effective. Yet, each of us firmly believes that they are well worth implementing.

It is important to truly understand the "Golden Rules" concept and how these rules actively contribute to preventing serious injuries and fatalities. Furthermore, it seems crucial to present some simple principles and share certain best practices along with pitfalls to avoid. These can be easily transposed to adapt to each company's context.

Golden Rules are not the only means of prevention

Reducing the number of safety incidents recorded does not automatically lead to a drop in the number of serious injuries and fatalities. This is what some international experts have found, and the discussion group's research confirms it.

Due to the non-linearity of the "accidents-incidents-causes" chain, we cannot hope to eliminate serious accidents by focusing only on reducing the number of minor incidents or accidents, without regard for serious injury and fatality potential (SIF potential). This means that, in order to prevent these serious accidents effectively, we must analyse and reconstruct the scenarios in which they occurred. By working on the most dangerous situations and on incidents with a high SIF potential, we can break away from the widespread approach which focuses on reducing the base of the Bird pyramid.

The precursors of accidents resulting in serious injuries and fatalities thus need to be identified.

Serious injury and fatality precursor

Definition

A serious injury and fatality precursor "is an uncontrolled high-risk situation which will result in serious or fatal injury if left unchecked"

Webinar - BST solutions.com (Krause, 2012)

Based on this understanding of precursors, to present a more comprehensive view of the serious injury and fatality prevention model, the discussion group worked on formalising its various components (see Fig. 0.1).

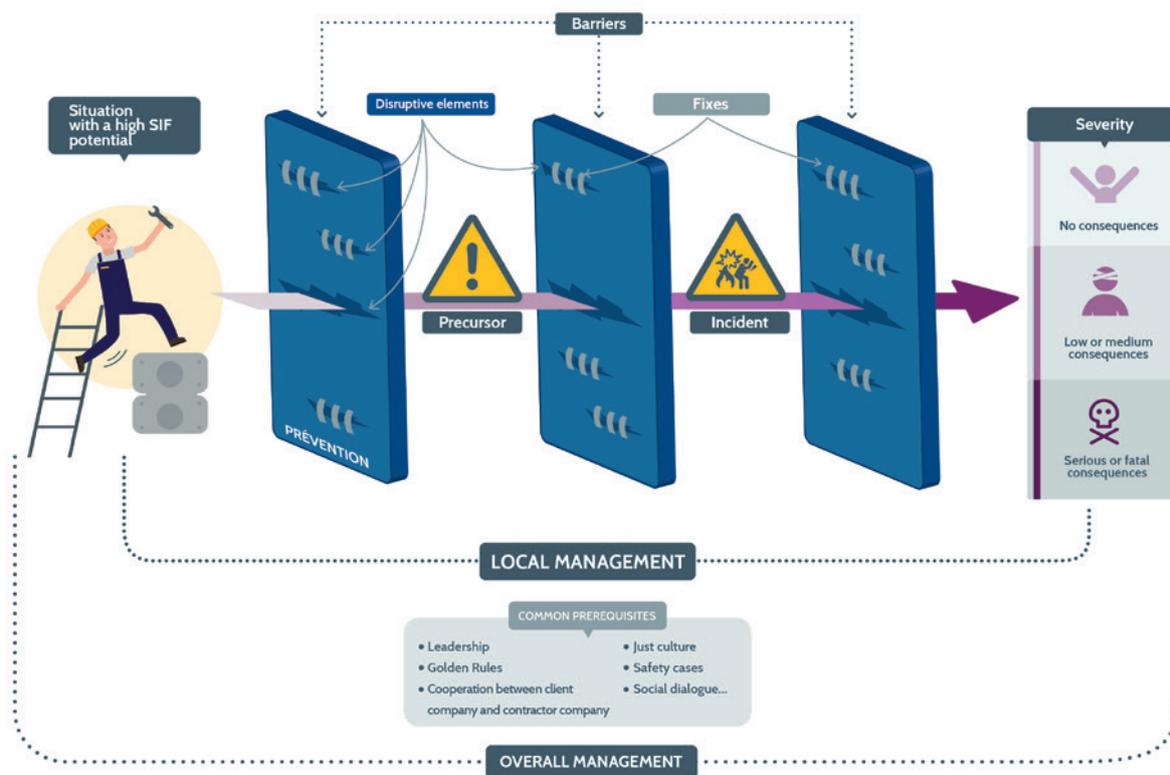


FIG. 0.1 – The serious injury and fatality prevention model

The overall structure encompasses the different concepts that emerged from the work carried out by the “Serious Accident Prevention” discussion group.

It all starts with a situation or activity that places one or several workers in the presence of a hazard with a high potential for serious consequences. A defence-in-depth system is put in place which includes barriers:

- ▷ for **prevention** (to minimise the risk),
- ▷ for **recovery** (to return to a state of controlled risk following a loss of control),
- ▷ and to **mitigate** the consequences of the dreaded incident (accident).

Two types of elements were considered as the factors underlying the loss of control over potentially serious situations:

- ▷ on the one hand, the existence of **situations with a high SIF potential** and the failure of the defence mechanisms (barriers) designed to eliminate risks or bring them down to acceptable levels,
- ▷ on the other hand, **chronic or occasional disruptive elements** that could weaken control over serious and fatal risks, or in other words of the defence-in-depth system in place.

The discussion group revealed five major categories of disruptive elements:

1. **External:** weather conditions, client intervention, etc.;
2. **Planning/execution:** discrepancies between what is planned and the reality of the actions needing to be taken (improvising, “making do”, etc.);
3. **Direct from individuals:** health issues, personal problems, actual ability, etc.;

4. **Procedure(s), facilities and equipment:** frequent breakdowns/malfunctions, reduced performance, etc.;
5. **Management/Organisation:** conflicting objectives, inadequate decision-making (resources/objectives, normalisation of deviance¹, etc.).

In addition to the prevention barriers which serve to eliminate risk or bring it down to an acceptable level, other defences were taken into account: **recovery actions**. Once the “precursor” level is reached, these are the actions that ultimately make it possible to avoid the accident. Lastly, rounding off the defence system, **mitigation actions** help to reduce the impact of the accident if it does occur.

The prevention model thus established takes into account common prerequisites that are general measures necessary for implementing the serious injury and fatality prevention policy. These include the implementation of a policy for dealing with non-compliance and rule bending (recognition and sanctions) through a “just culture”, which is perceived as fair by all members of the organisation.

Completing the system is local and overall management, handling monitoring, operational experience feedback and the associated decision-making system.

Beyond the Golden Rules: the importance of defence in depth

To prevent serious injuries and fatalities, their occurrence must be anticipated through the detection of precursors. As the prevention model developed based on the discussion group’s work shows, this implies putting in place a defence system which includes different types of barriers.

The following are some of the barriers that were identified:

- ▷ direct physical or organisational preventive measures for the most hazardous situations,
- ▷ recovery measures which prevent the threat from turning into an accident once the loss of control threshold (precursor) has been reached,
- ▷ mitigation measures aimed at limiting the effects of an accident that does occur, by reducing its consequences on those affected.

This classic system, which applies only to the situations posing the most serious risks, must be supplemented with actions to prevent internal or external causes and the chronic disruptive elements that can affect a large portion of the company’s organisation. Occasional disruptive elements are, by their very nature, more difficult to anticipate. Hence, they must be included in a well-defined alert system and actors must be trained in “initiative-based safety”, which is crucial for managing them².

All of these measures form a defence-in-depth system, there to ensure that a serious accident can only happen if, due to a combination of several disruptive elements, the various barriers in place to minimise its occurrence are breached.

The Golden Rules are part of this defence-in-depth system. It is important to have a solid understanding of where they fit in to this system and what other measures need to be in place to ensure they are as effective as possible. Under no circumstances should they be the only system in place for preventing serious injuries and fatalities. There are other rules that contribute to this prevention.

If they are fit for purpose, obeyed and accepted by all individuals concerned, the Golden Rules are an important element of safety culture. The Golden Rules undeniably fall under the “Safety Management System (SMS)” pillar of safety culture, due to their “rule” status. But in many aspects, including the managerial will that underpins them and their emblematic character, their implementation will impact on the other pillars, and more particularly the “human and organisational factors” pillar, so that all credibility, feasibility and effectiveness conditions can be met.

1. The normalisation of deviance:

- to keep up production, management will sometimes accept, or even demand, that certain rules be broken;
- when breaking certain rules becomes a habit, all the others become weakened.

2. Initiative-based safety (also known as “managed safety”): “the skill of the workers who are present on the spot in real time, identify the actual situation and react appropriately.” The ICSI “Safety Culture” working group (2017). *Safety Culture: From Understanding to Action*. Issue n° 2018-01 of the *Cahiers de la Sécurité Industrielle* collection, Institut pour une Culture de Sécurité Industrielle (ICSI), Toulouse, France. Available as a free download from: <http://www.icsi-eu.org/>

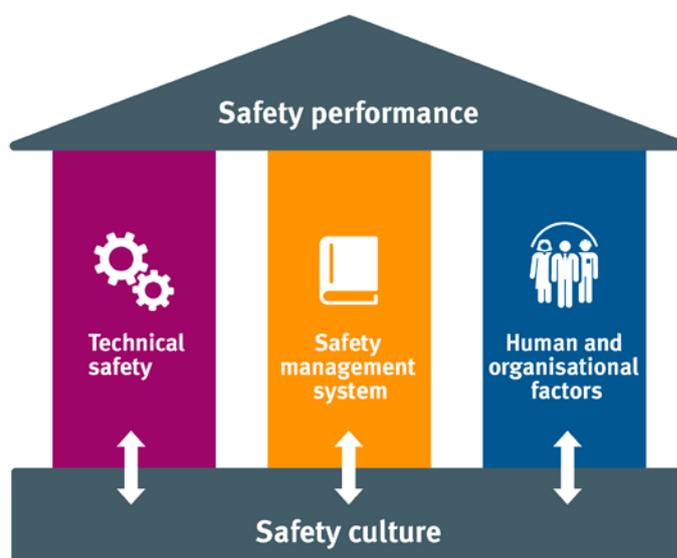


FIG. 0.2 – *The three pillars of safety culture*

As an example to illustrate this complementarity, how can a rule requiring workers not to service electrical equipment without first performing a lockout/tagout be introduced if the technical conditions for lockout/tagout, and in particular for taking machines out of service, are not in place? Similarly, monitoring their implementation and their effectiveness will be a major focus of performance management and audits due to the importance the company attaches to them. Thus all three of the aspects of safety culture are affected and necessary in order to ensure the Golden Rules become firmly embedded in the company culture for the long term.

About the creation of this *Cahier*

A five-step process was followed:

1. First, all that was discussed by the “Serious Accident Prevention” discussion group during their meetings focusing on the Golden Rules and held between 30th October 2014 and 1st December 2015 was compiled and summarised. Next, the results of the “Golden Rules” study conducted by Michel Descazeaux were added to this summary;
2. ICSI then drafted an outline of the key elements of Golden Rules approaches and submitted this preliminary draft to the members of the discussion group for review;
3. A day was set aside during which the members of the discussion group convened to enrich the document with their comments, observations and further information;
4. ICSI then consolidated and formatted the document for final approval by discussion group members;
5. The “Golden Rules” document was finalised.

Document outline

The first part of this *Cahier* presents an overview of the 8 principles of a Golden Rules approach, constructed based on the information collected during the meetings of the “Serious Accident Prevention” discussion group held starting in 2014. In this first part, the *Cahier’s* authors also present a short summary of key points relating to each of the principles.

The remainder of the *Cahier* presents each of the eight key steps in further detail and, for each, summaries the main debates that took place during the meeting. It also presents several more or less detailed examples, along with some of the best practices shared by companies that participated in the discussion group and actually apply one or several principles of the Golden Rules approach.

This document is therefore divided into eight chapters deliberately kept short and concise in the interest of readability.

What this document is and is not

This *Cahier* is absolutely not intended as a guide providing ready-made, “one-size-fits-all” solutions, nor as a conclusion to the topic covered in the discussion group. It is neither exhaustive nor set in stone. It is a document reflecting the current thinking and findings of the “Serious Accident Prevention” discussion group and thus it is bound to evolve.

Although this *Cahier* presents an assessment that was, for the most part, shared by all the stakeholders represented in the discussion group, it is important to stress that a consensus was not reached on some of the points and in fact there were some diverging opinions among the participants.

This *Cahier* is therefore more of a starting point for the work to be carried out on this topic.

Part One

General overview of the 8 key principles of a Golden Rules approach

The 8 key principles of a Golden Rules approach

1.1 Preamble

The recommendations presented here were formulated based on the point of view of the “Serious Accident Prevention” discussion group members and validated by ICSI’s review committee.

Of course, given the diversity of participants, both in terms of the types of organisations they represent (major industrial players, companies, research institutes, trade unions) and their roles (HSE department, technical director, HSE manager, operational staff, members of the OH&S committee, etc.), each member’s motivations and degree of latitude are very different and often complementary. An employee who is a member of the OH&S committee will insist more on involving the representative bodies in the Golden Rules implementation process, while an HSE manager might bring up the importance of exemplary behaviour from the chain of command. Heads of major global industrial companies, on the other hand, will likely wish to discuss implementing the approach in several countries and the cultural differences that may need to be managed.

Consequently, readers may need to develop their own interpretation of certain recommendations, which are based on the experience of the various discussion group members, in order to apply them to their own context.

1.2 Overview of the principles

An approach to **successfully creating your future safety culture** to be tailored to your context, of course!

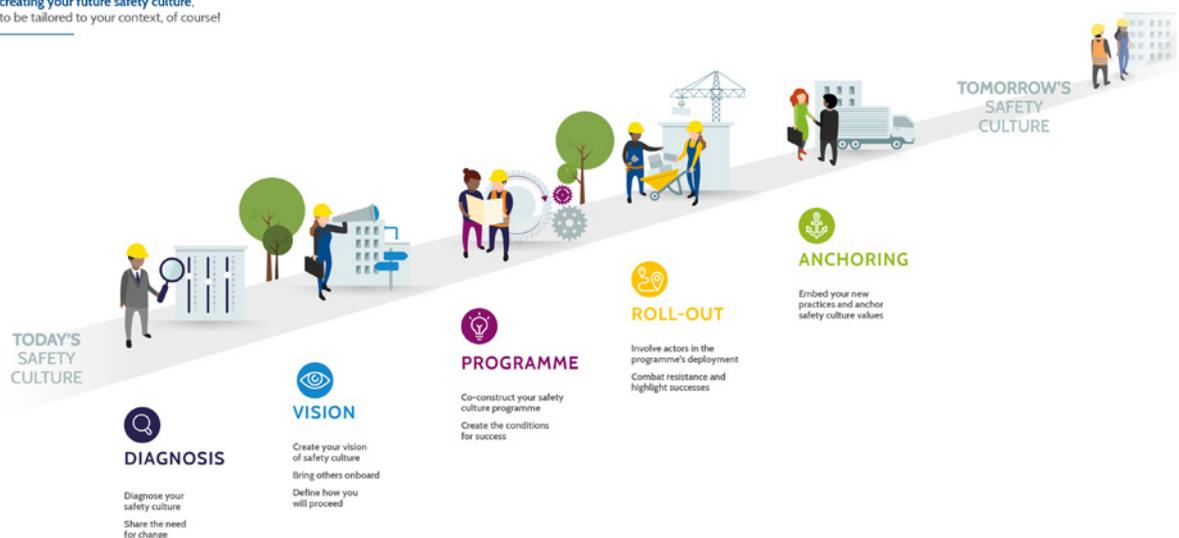


FIG. I.1.1 – ICSI’s general approach for evolving towards an integrated safety culture (adapted from J. Kotter)

Eight general principles for a Golden Rules approach have thus been identified and broken down into concrete actions by the members of the discussion group. These principles are inspired by first-hand experiences in organisations undertaking change projects, not necessarily relating to Golden Rules.

These experiences were reviewed in the light of research work on change management, inspired by that of John Kotter¹.

This model was adapted by ICSI into a process for evolving towards an integrated safety culture.

Based on this approach and an analysis of all that emerged in the discussion group meetings, a list of eight general principles was established, following the major steps in the approach but adapted specifically to the implementation of Golden Rules. These principles echo Kotter's, but emphasise the set-up of a coalition and the importance of ensuring synergy with the actions and processes of any external contractor companies.

These steps are intended as a general guide. Their chronological order is not set in stone. To be effective, certain actions will need to be undertaken while others are still under way. What is crucial is the ability to adapt to the reality of situations and to opportunities.

General principles	Actions
<p>1. Choose the Golden Rules using a structured and highly participative methodology</p>	<ul style="list-style-type: none"> ▷ Perform a detailed analysis of the accidentology to take into account past accidents. ▷ Take all activities and all hierarchy levels within the company into consideration. ▷ Cover situations where there are risks to safety at the work station and where process safety may be jeopardised². ▷ Identify the type of protection provided by the Golden Rule: prevention, recovery, mitigation. Determine where it fits in to the overall prevention system. ▷ Formulate rules that are emblematic, simple, limited in number, and suited to the reality at the sharp end. ▷ Involve employees and their representative bodies³ in the elaboration of the Golden Rules. ▷ Ensure that the Golden Rules comply with all applicable laws and regulations.
<p>2. Ensure the rationale behind the Golden Rules is understood and the teams embrace the safety vision</p>	<ul style="list-style-type: none"> ▷ Ensure that the importance of the Golden Rules in preventing serious injuries and fatalities is clear. ▷ Commitment on two sides: management – workers. ▷ Have the company's top management drive the approach. ▷ Involve the chain of command. ▷ Ensure the entire organisation is mobilised to support the Golden Rules. ▷ Involve occupational groups and individuals. ▷ Give careful thought to a just culture (recognition and sanctions).

1.. Kotter, John P. (2012) *Leading Change*, Boston Massachusetts, Harvard Business Review Press

2. Processes: this refers to industrial processes for manufacturing goods, producing energy... or service processes

3. In France: employee representative bodies

<p>3. Train and coordinate a strong coalition for a successful implementation of the Golden Rules</p>	<ul style="list-style-type: none"> ▷ Identify all the key actors in the coalition. ▷ Include the different echelons of management in the coalition's inner circle. ▷ Train the echelons of management in enforcing the Golden Rules. ▷ Involve staff representatives and employee representative bodies in the approach. ▷ Include all other stakeholders in the coalition, notably the support functions and any contractor companies. ▷ Identify the opinion leaders and give them a role in the coalition.
<p>4. Identify any obstacles to applying the Golden Rules, address them and organise a solution</p>	<ul style="list-style-type: none"> ▷ Identify the technical and organisational obstacles to applying the Golden Rules - institutionalise a transitional implementation phase. ▷ Identify any conflicts or inconsistencies that might exist between the Golden Rules and other orders. ▷ Institutionalise the right and duty to say STOP when the conditions for applying a Golden Rule are not in place. ▷ Decide on the decision-making process to use when there is some difficulty in applying a Golden Rule. ▷ Anticipate the need for special dispensations in place for the Golden Rules, along with a process for the reporting and immediate handling of any situation involving them.
<p>5. Encourage work group appropriation of the Golden Rules.</p>	<ul style="list-style-type: none"> ▷ Mobilise the chain of command to enforce the rules within the work groups while taking into account their cultural differences, and support managers with a communication plan that is regularly updated and improved. ▷ Structure team meetings and periodic huddles around the Golden Rules and ensure everyone understands why they are in place. ▷ Pay special attention to the Golden Rules during visits by management. ▷ Encourage employees to look out for one another's safety and motivate them to take appropriate action when their co-workers find themselves in hazardous situations. ▷ Ensure each individual plays an active role in spotting and identifying situations in which it is difficult to apply the Golden Rules. ▷ Implement an incident reporting and stop work procedure or enforce the one(s) already in place. ▷ Use a mentoring system and involve mentors in teaching new recruits the Golden Rules. ▷ Implement "quick wins" to inspire workers to keep following the rules. ▷ Ensure social dialogue about the Golden Rules is open.

<p>6. Establish and implement a recognition and sanctions policy that is perceived as fair, to ensure adherence to the Golden Rules</p>	<ul style="list-style-type: none"> ▷ Work with employee representative bodies to establish the fair recognition and sanctions policy. ▷ Give recognition when workers apply the Golden Rules correctly (positive reinforcement). ▷ Impose just and fair sanctions when Golden Rules are broken. ▷ Ensure that incident root cause analysis is of a high standard and not focused solely on sharp-end workers.
<p>7. Introduce the Golden Rules for the long term and anchor them in the organisation's practices</p>	<ul style="list-style-type: none"> ▷ Ensure everyone is aware that "A golden rule must be kept alive if it is to save lives". ▷ Update the Golden Rules to keep them fresh in everyone's mind. ▷ Teach the Golden Rules to new hires as part of their onboarding and job training. ▷ Use first-impressions questionnaires or reports. ▷ Include a reference to the Golden Rules in incident/accident analysis by searching for the root causes as to why they were not followed. ▷ Introduce and share indicators to measure the success of the Golden Rules implementation. ▷ Implement Golden Rule application audits as part of a general evaluation system.
<p>8. Ensure synergy with equivalent contractor-company processes and vice versa</p>	<ul style="list-style-type: none"> ▷ Engage in constructive dialogue to confirm the convergence/coherence of the different sets of "Golden Rules". ▷ Ensure the involvement of company and external contractor company management is visible when implementing the Golden Rules. ▷ Hold joint toolbox talks about the Golden Rules, ▷ Manage safety tools (safety, event analysis) jointly. ▷ Promote the duty to call things out, regardless of status. ▷ Encourage people to report the situations in which the rules cannot be applied. ▷ Introduce "initiative" type challenges to give positive reinforcement when the Golden Rules are being followed.

TAB. I.1.1 – The 8 key principles of a Golden Rules approach

Each of the eight key principles was discussed and debated in order to identify best practices that could be shared, as well as some guiding principles to help managers, personnel and HSE support departments to implement Golden Rules and maximise their chances of success.

Summary of the key points for each principle

2.1 Choose the Golden Rules using a structured and highly participative methodology

This first step of choosing the Golden Rules will determine the direction to take for the rest of the actions as well as their effectiveness. The following key points need to be taken into account:

- ▷ Studying the serious accidents and the near-misses with a high SIF potential which have occurred over several years draws on the real-life experience of the organisation's actors. Accident analyses do not always reveal root causes. Achieving a deeper understanding requires a cross-functional group and the examination of similar situations within other companies;
- ▷ The Golden Rules must be limited in number;
- ▷ To be suitable, the Golden Rules must directly or indirectly apply to all actors in the company;
- ▷ Analysis of serious injuries and fatalities shows that these are due to the work environment or to processes. The link between occupational safety and process safety must therefore be established when setting Golden Rules;
- ▷ Each Golden Rule may focus on direct prevention, recovery or mitigation to limit the consequences of an accident. Broader actions called "prerequisites" can be expressed via the Golden Rules. Properly identifying the nature of what the Golden Rule is seeking to address makes it possible to determine where it fits in to the prevention system as a whole;
- ▷ Involving employees in the process of choosing the Golden Rules is important in helping to ensure that they embrace and apply them;
- ▷ Co-constructing the Golden Rules means involving as many people as possible within the company, not just the HSE department and the sharp-end workers. The support functions play an important indirect role in preventing serious injuries and fatalities. Consequently, they must also be involved.
- ▷ Ensure that the Golden Rules comply with all applicable laws and regulations. Golden Rules help to clarify and highlight the measures which are considered important for preventing serious and fatal risks. Under no circumstances should they conflict with existing regulations. It is important to verify this.

2.2 Ensure the rationale behind the Golden Rules is understood and the teams embrace the safety vision

This second step was somewhat overlooked in some of the situations observed, even though it is more important than it might initially appear.

- ▷ Senior management plays an essential role in explaining the reasons behind the rules and the decision to introduce them. The commitment of all employees, including work groups and individuals, must be sought by involving them through measures suited to the context;
- ▷ The preservation of life is a shared value that can mobilise people if it is backed by *ad hoc* resources;
- ▷ The local cultural aspect, and particularly the attitude toward death, should be taken into account but this is not essential;

- ▷ The issue of contractor companies is crucial, even in this phase, since it is often within their ranks that serious injuries and fatalities occur. They must therefore be involved in this step;
- ▷ The assessment of the safety situation should be shared;
- ▷ Implementing a “just and fair culture” is crucial if one is not already in place, to enable workers to distinguish what is acceptable from what is not, especially when it comes to the Golden Rules.

2.3 **Train and coordinate a strong coalition for a successful implementation of the Golden Rules**

This third step aims to focus efforts on implementing the Golden Rules for the long term:

- ▷ Senior management plays an essential role in explaining the reasons behind the rules and the decision to introduce them;
- ▷ The vision must be upheld by top management, but the strategy must involve the different actors in the coalition right down to the local manager who, from this phase onward, must be given the means to understand it, facilitate its implementation and enforce it;
- ▷ Employee representatives and representative bodies must be involved in the implementation process;
- ▷ Including the support functions, the social partners, and external contractor companies in the coalition is important to ensure that the Golden Rules are successfully implemented and become firmly anchored within the organisation. This can take the form of a cross-disciplinary team in place for the duration of the project;
- ▷ Opinion leaders must be identified, given a role in the coalition, and time must be spent on preparing them.

2.4 **Identify any obstacles to applying the Golden Rules, address them and organise a solution**

This fourth step should make it possible to identify any obstacles to the implementation and find solutions to overcome them:

- ▷ To be credible, the Golden Rules must be applicable in all circumstances;
- ▷ Any situations in which it is impossible to apply the Golden Rules must therefore be identified, handled transparently, and known to all;
- ▷ The process enabling operational staff to report the impossibility of applying one or several Golden Rules, and stop or shut down any operations under way if necessary, must be established and shared with all concerned. Decision-making (including who has the authority to decide) should be covered in the process;
- ▷ The conditions for granting a special dispensation from applying the Golden Rules must be established and shared with all concerned.

2.5 **Encourage work group appropriation of the Golden Rules**

This fifth step consists in ensuring that every individual internalises the Golden Rules:

- ▷ Work group appropriation of the Golden Rules is essential. All echelons of management must actively ensure this;
- ▷ Team meetings, safety visits by management, and opportunities for interaction, including with the support functions, are all good times to discuss the Golden Rules;
- ▷ Encouraging workers to look out for one another’s safety and implementing stop work processes for situations where it is impossible to apply the Golden Rules increases the credibility of the initiative and thus the likelihood that workers will embrace it;

- ▷ Mentoring and supporting new recruits helps to make the rules stick;
- ▷ Quick-win actions, where results are visible in the short term, help to ensure the Golden Rules are followed and stay front of mind;
- ▷ Open social dialogue about the Golden Rules is also a good base for successful rule appropriation.

2.6 Establish and implement a recognition and sanctions policy that is perceived as fair, to ensure adherence to the Golden Rules

This sixth step will allow everyone to understand what is acceptable and what is not, and facilitate the upward reporting of deviations from the Golden Rules and any difficulties in applying them:

- ▷ When implementing Golden Rules it is essential to clarify what is unacceptable, such as deliberate violations, and what behaviours should receive recognition and encouragement;
- ▷ For a just culture implementation process to be sound and credible, it must involve all stakeholders, staff representatives and representative bodies first and foremost, and it must comply with applicable local legislation and regulations;
- ▷ It is important to give recognition for good practices in applying the Golden Rules (positive reinforcement) and sanction any deliberate violations;
- ▷ No hasty decisions should be made. Rather, an in-depth analysis should be carried out of the causes leading to deviations from the Golden Rules.

2.7 Integrate the Golden Rules for the long term and embed practices

This seventh step must guarantee that the Golden Rules and their effects can be sustained long term:

- ▷ Ensure that the “Golden Rules effect” lasts and becomes an integral part of the company’s day-to-day operations to avoid falling back into old habits and patterns;
- ▷ Updating and adjusting them to take into account feedback and lessons learned is a good way to get everyone refocused on them;
- ▷ Full training in the Golden Rules must be provided to young recruits and new hires;
- ▷ Include them in regular staff quizzes, surveys, first-impression reports, and discussions during sharp-end visits, to emphasise their prime importance;
- ▷ Set up a general system for measuring and monitoring their implementation and appropriation, using indicators, audits or inspections that are conducive to a successful implementation.

2.8 Ensure synergy with equivalent contractor-company processes and vice versa

This eighth and final step consists in organising the cooperation that is needed between client company and external contractor company in this area:

- ▷ It is often crucial to ensure that client and contractor company Golden Rules systems work in harmony, given how widespread outsourcing is and how significant the risks of serious injuries and fatalities are;
- ▷ There must be extensive dialogue between the client and the contractor company on this subject in order to show everyone that the two systems work in synergy;
- ▷ In practice, at the sharp end, every opportunity should be taken (joint toolbox talks and management visits) to demonstrate and explain that all parties share the same vision and conviction when it comes to serious injury and fatality prevention;

- ▷ It is important to make it easy for workers to look out for one another's safety and report situations in which it is difficult to apply the Golden Rules. The system shared between the client company and the contractor company must be able to provide speedy solutions;
- ▷ To encourage all workers to comply with the Golden Rules, positive reinforcement initiatives are powerful levers that the parties should not hesitate to implement together.

Part Two

**Detailed presentation
of the 8 key principles
of a Golden Rules approach:
the essence of the debates
and some first-hand experiences**

Choose the Golden Rules using a structured and highly participative methodology

1.1 The essence of the debates

What will these Golden Rules be? What should they cover? To whom do they apply? How can we ensure that everyone will understand them and, more importantly, that they are suited to our activities, the types of accidents we encounter and our hazardous situations? All of these questions surround the first step of a Golden Rules approach, because choosing the right rules is in itself a first and important challenge for the company.

1.1.1 Perform a detailed analysis of the accidentology to take into account past accidents

The first step in choosing Golden Rules is to perform a detailed analysis of the serious injuries and fatalities that have occurred over the previous years. Generally, given the small number of incidents, broadening the analysis to include near-misses is recommended. This study should reveal the high-risk situations to which employees are likely to be exposed. Gathering precise information about the root causes of these situations with a high hazard potential is therefore an essential “prerequisite” for the company. If such information is lacking, or to round out a study carried out internally, it is possible to research what has been or is being done in other companies with similar activities.

The bulk of this work and research will be performed by the HSE department. However, it is recommended that a cross-functional group be put together to carry out the work and liaise back and forth with the branches, divisions, subsidiaries or, if possible, local entities to gather as much information as possible about situations with a high hazard potential.

1.1.2 Take all activities and all hierarchy levels within the company into consideration

There is a widespread and unspoken belief that Golden Rules only apply to sharp-end workers and to operational situations. This is a pitfall that should obviously be avoided. The Golden Rules must directly or indirectly cover all of the company’s activities and under no circumstances are they exclusively applicable to frontline staff. If they were, this would indicate that the company holds sharp-end workers entirely responsible for any accidents that occur.

It is therefore important to take all activities and all levels of hierarchy into consideration. Sales teams, for example, are too often overlooked when implementing safety-related initiatives and yet they are highly exposed to the risk of road accidents. Another example is logistics departments. They are rarely on the front line but should not be left out of the picture.

Finally, it is quite alright to include rules referring to managerial practices (setting the example, visibility) or to the management of working conditions by the chain of command (availability and condition of personal and collective protective equipment or tools, handling of suboptimal conditions, etc.). This sends a strong message, as these Golden Rules involve management through the conditions for applying the other Golden Rules.

1.1.3 Cover situations where there are risks to safety at the work station and where process safety may be jeopardised

Serious injury and fatality precursors linked to processes cannot be completely dissociated from serious injury and fatality precursors linked to the work station. In fact, Reason (1997)¹ showed that latent conditions are universal and shared. Consequently, a link must be established between safety at the work station and process safety, and the golden rules must cover risky situations that can stem from either one.

1.1.4 Identify the nature of the action covered by the Golden Rule (prevention, recovery, mitigation) and determine where it fits in to the prevention system

According to the model established based on the discussion group's work on serious injury and fatality precursors (see Fig. 0.1), the Golden Rules or the principles identified may be classed into four major spheres of action.

▷ **Control of situations involving serious and fatal risks and defence mechanisms (or associated barriers).**

This is about the direct **prevention** of the most significant risks. These barriers may be physical or organisational. Their purpose is to reduce or even eliminate the risk at its source. Their wording states how to control the risk and, sometimes, the risk itself. For example: *"Only enter the trench if the cave-in protection is in place and appropriate"*; *"Never walk or stand under a suspended load"*. The way these situations and any associated measures are described varies greatly from one company to another;

▷ **Common prerequisites for the general management of serious injury and fatality prevention.**

These are broader measures that apply to a whole range of situations. The main examples mentioned: *"risk analysis and management, SimOps and associated risks, work permit procedures"*;

▷ **Control of chronic and occasional disruptive elements.**

This is about preventing the latent conditions and root causes that contribute to the loss of control (precursor) which could lead to a serious accident. These situations are addressed in Golden Rules in some companies, for example: *"being under the influence of drugs or alcohol while working"* or *"talking on the phone during risky activities"*, and also *"tidiness and cleanliness"*. Disruptive elements tied with the way the organisation operates: *"plant start-up or shutdown"*, *"inadequate resources"*, *"discrepancies between work preparation and execution"*, or even: *"maintenance work or its consequences"*, appear far less in companies' Golden Rules;

▷ **Control of recovery and mitigation actions.**

The other areas to control are recovery and mitigation. Recovery aims to prevent the accident once critical point is reached. Out of the Golden Rules that were discussed, this was the case for *"harness use"* which prevents falls, or for *"stop card"* procedures, which allow workers to reassess risks and hazards in a situation deemed abnormal. As for mitigation, its purpose is to limit the consequences of the accident. These are measures such as the *"seat belt"* or the *"emergency plan"*, which will reduce the physical impact of the accident and ensure any injured parties are transported and attended to quickly in the best possible conditions.

The nature of the Golden Rule chosen must be properly identified to determine where it fits in to the overall prevention system. Indeed, the Golden Rule is part of the defence system and the complementary actions that must accompany it need to be properly analysed if the system as a whole is to be effective. It is perfectly understandable, for example, that a rule stating that a harness should be used during work at height must be backed by actions implementing collective protection, from the work design phase to the set-up of installations, if it is to be understood and effective.

1. Reason, James T. (1997) *Managing the Risks of Organizational Accidents*, Brookfield Vt., Ashgate

1.1.5 Formulate rules that are emblematic, simple and limited in number

Particular attention should be paid to the way the Golden Rules are formulated. The rules must be clear in their content and easily understood by all. They are often accompanied by descriptive details to clarify their content but these can confuse the message and reduce their impact. They must be self-explanatory, punchy and easy for anyone to understand.

A maximum of 10 Golden Rules

Key point

The Golden Rules must be limited in number. This will significantly increase the chances of workers adopting them. Experience shows that when there are more than ten Golden Rules, they become difficult to assimilate.

Since these rules are considered to be essential rules that everyone must comply with, everywhere and in all circumstances, it is important to expose them to the reality at the sharp end through any means the company deems necessary. It is important to determine whether these rules can be applied in all conceivable conditions. Any rules that do not meet this requirement should be rewritten or abandoned. This step can be carried out as a participatory process within the company.

1.1.6 Involve workers in the elaboration of the Golden Rules so that these align with the reality of work situations at the sharp end

The Golden Rules need to correspond to a reality that the workers are familiar with and understand. To ensure this, it seems paramount to involve the workers in the elaboration of the Golden Rules. Worker involvement is a condition for guaranteeing that the Golden Rules are applicable and it also helps to ensure employees embrace the rules and follow them. This involvement may take the form of co-construction workshops held during the elaboration phase of the Golden Rules. Workers find these workshops highly rewarding, as they get to see that the company appreciates their competence and daily contributions. This involvement may also be via the institutions in charge of social dialogue.

In practice, it would seem that cross-functional teams are put together to design the Golden Rules and form the monitoring committee, but the general impression is that the process as a whole is steered by the HSE department, working with top management. Even though all of the companies involved in the discussion group's work agree on the fact that this limits the success of their projects significantly, by their own admission co-constructions are few. Any analyses of past accidents and benchmark studies are usually performed by the HSE departments. This does not mean that there are no discussions with other levels within the company or with operational staff, including local managers, but these are rather few and infrequent.

Worker involvement

Example

- ▷ The company involved the social partners heavily when elaborating the Golden Rules.
- ▷ The company values worker involvement in formulating the Golden Rules.

1.1.7 Ensure that the Golden Rules comply with all applicable laws and regulations

Ensure that the Golden Rules comply with all applicable laws and regulations. This obligation is all the more necessary when the Golden Rules concern several types of regulations and several countries. It is important to ensure that the Golden Rules do not contradict existing laws and regulations in any way, even if that means checking directly with the competent authorities. All applicable regulations should be carefully examined, particularly those relating to industrial processes and technological risks, and those linked to the workplace and to health.

Informing the authorities in charge of inspections seems well-advised. After having chosen the Golden Rules and checked that they comply with regulations, this can help to give more credibility to the company's management system.

Summary: choosing the Golden Rules

Key point

- ▷ This first step of choosing the Golden Rules will determine the direction to take for the rest of the actions as well as their effectiveness;
- ▷ Studying the serious accidents and the near-misses with a high SIF potential which have occurred over several years draws on the real-life experience of the organisation's actors. Accident analyses do not always reveal root causes. To achieve a deeper understanding, a cross-functional group and a look at similar situations in other companies are required;
- ▷ The Golden Rules must be limited in number;
- ▷ The Golden Rules must directly or indirectly apply to all of the organisation's actors if they are to be pertinent;
- ▷ Analysis of SIF shows that these are due to the work environment or to processes. The link between occupational safety and process safety must therefore be established when setting Golden Rules;
- ▷ Each Golden Rule may focus on direct prevention, recovery or mitigation to limit the consequences of an accident. Broader actions called "prerequisites" can be expressed via the Golden Rules. Properly identifying the nature of what the Golden Rule is seeking to address makes it possible to determine where it fits in to the prevention system as a whole;
- ▷ Involving employees in the process of choosing the Golden Rules is important in helping to ensure that they embrace and apply them;
- ▷ Co-constructing the Golden Rules means involving as many people as possible within the company, not just the HSE department and the sharp-end workers. The support functions play an important indirect role in prevention.

1.2 First-hand experience

Why did you implement Golden Rules?

“ In 2013, we noticed that the progress we'd made in lowering our incident rate had had zero impact on serious injuries and fatalities. Our contractor companies reported the same. We began searching for a best practice that could improve our performance in this area and some of our partners were implementing Golden Rules. ”

How did you choose your Golden Rules?

“ We analysed our 596 fatal accidents recorded over 30 years. 150 were due to a health incident, often a heart attack, 120 to the commute between work and home, and all the others were more directly linked to the activities and sites. We therefore established 7 vital rules to prevent the risks tied to our work environment and 3 other rules relating to road safety. By applying them to the organisation and the employees, we can avoid 2/3 of accidents! ”

How did you analyse the road accidents?

“ There is often a “code of silence” out of respect for the deceased or because of legal proceedings under way. Since we are no different to other citizens, we arbitrarily decided on 3 vital rules to follow when behind the wheel: one relates to the use of mobile phones, another to speed and seat belts, and a third to drugs and alcohol. ”

Isn't it difficult to choose and implement Golden Rules without any statistical analyses to draw on?

“ Our focus is on the safety of our employees. This is a goal shared by the entire organisation. We have a community of European OH&S officers who are used to working with employee representatives. They were there to help formulate sentences but not only that! If we wanted them on side, we had to co-construct from the start. It was very important. ”

Examples of Golden Rules: Risk prevention 1

(Actual examples from companies)

- ▷ Only work on equipment if its power source is isolated.
- ▷ All collective protective equipment must be in good condition, particularly the machine protections.
- ▷ Get permission before inspecting or neutralising equipment that is important for safety.
- ▷ Electrical hazard: access to electric panels and electrical enclosures is restricted to approved personnel only.
- ▷ Follow the 5-step lockout/tagout procedure: disconnect completely, secure against re-connection, check that the installation is dead, carry out earthing and short-circuiting, provide protection against adjacent live parts.
- ▷ Always use all specified protective equipment when working on live equipment.
- ▷ Never enter a confined space without authorisation, air quality checks and monitoring.
- ▷ Before entering a confined space, ensure the air quality is checked and monitored throughout the operation.
- ▷ Only enter the trench if the cave-in protection is in place and appropriate.
- ▷ Never walk or stand under a suspended load.
- ▷ Follow the lifting plan instructions.
- ▷ Always secure your harness when working at height.
- ▷ When working at height, always wear your harness except in the presence of collective protective equipment and with authorisation.

FIG. II.1.1 – *Examples of Golden Rules: Risk Prevention 1*

Ensure the rationale behind the Golden Rules is understood and the teams embrace the safety vision

2.1 The essence of the debates

Priority to the most significant risks

Key point

First and foremost, as stated in the introduction to this Cahier, a safety culture approach (Daniellou, 2017)¹ must target the most serious risks as a priority. At least in part, the Golden Rules reflect this shared awareness of the most significant risks that is the foundation stone of the company's safety culture.

It is crucial to spend time on this critical step in the Golden Rules implementation process. This is what change management experts call “convincing people that change is needed”. It comes down to asking the question, what can be done to make people accept the need for change and embrace the Golden Rules? What can be done to ensure they all share the same perception of the safety risk and for that to trigger something within them that will push them to commit? At this stage, the company must seek to make all of the actors concerned realise that the Golden Rules approach is justified. If workers are to get behind the changes that concern them directly from the start, they need to be involved in the process early on.

2.1.1 Ensure that the importance of the Golden Rules in preventing serious injuries and fatalities is clear

To make people want to change, the desired change first has to make sense to them. A Golden Rule isn't just another rule. It drives change in the safety culture. It is a useful rule that prevents serious injuries and fatalities. Golden Rules must not be interpreted as reminders of regulations or as a set of constraints, but rather as strong safety principles that apply to all actors, including managers and their management style. This is not a given, in spite of the fact that everyone understands saving lives is a worthwhile pursuit. It proves difficult for companies to get all workers to accept the idea that the Golden Rules, whose application will be monitored and any deviations measured, will enable the company to tackle serious injuries and fatalities effectively. As such, time must be taken to build, share and promote a safety vision in which they are a lever for progressing towards better control over situations that pose serious risks.

2.1.2 A mutual commitment from management and workers

For this type of approach to be successful, there needs to be a mutual commitment from both management and workers.

Top management commits to showing strong leadership in driving action (decision-making, setting the example, credibility, making resources available) while developing various practices to encourage active involvement from sharp-end workers in rigorously applying the Golden Rules. When the participative approach is well

1. The ICSI “Safety Culture” working group (2017). *Safety Culture: From Understanding to Action*. Issue n° 2018-01 of the *Cahiers de la Sécurité Industrielle* collection, Institut pour une Culture de Sécurité Industrielle (ICSI), Toulouse, France. Available as a free download from: <http://www.icsi-eu.org/>

implemented, it contributes to reinforcing rigorous rule application. The same applies to the presence of top management at the sharp end, described as a participative leadership practice. This presence should also be spent observing the application of the Golden Rules and talking to workers in order to identify any necessary improvements.

The workers, on the other hand, commit to complying with the established rules, but also to taking safety-related initiatives in situations where the rules might not be followed correctly by co-workers, or even by a manager (intervention, discussion, reminders). They must stop any operations under way as soon as a situation makes it impossible to apply a Golden Rule. They must report the situation to their superiors and take all necessary measures before pursuing their work (risk analysis, compensatory measures).

A mutual commitment charter

Example

The mutual commitment can be formalised in a charter signed by top management and the teams. But beware: a signature does not mean everyone can now rest on their laurels. Each individual must then show their commitment and ensure that their practices, words and actions are aligned and consistent when it comes to applying Golden Rules.

2.1.3 Have the company's top management drive the approach

To create the willingness to change, a sense of urgency and criticality needs to be created and felt by all. This requires active involvement from the different echelons of management.

The discussion group participants are unanimous: the decision to implement a Golden Rules approach must come from top management. The impetus must come from the very top of the chain of command. Top management must be able to convince the teams of the need to change. They must champion the vision.

Executive committee involvement

Example

Le comité de direction associe la démarche Règles d'or aux valeurs de l'entreprise, dont le fait que les accidents graves. The executive committee associates the Golden Rules with the company's values, including the fact that serious injuries and fatalities are unacceptable.

The executive committee communicates about the fact that the Golden Rules are chosen to avoid the recurrence of serious accidents and thus to protect the lives and health of the workers, including external contractors and any other person who might find themselves in the vicinity of the facilities and equipment.

The executive committee understands the pressing need to distinguish clearly between unbreakable rules ("absolute no-gos") and recommendations from which it is acceptable to deviate if compensatory measures are taken.

An assessment was carried out within the company. It revealed the importance of changing and of implementing certain Golden Rules. All employees were informed of the results and the executive committee ensured they were understood by all.

2.1.4 Involve the chain of command

All echelons of management must understand the rationale behind the changes and ensure workers at the sharp end embrace them.

Involvement from the different echelons of management

Example

The executive committee ensures that all echelons of management can see the need to implement Golden Rules; particularly first-line managers, since they will then enforce the Golden Rules among the teams each day.

The entire chain of command thoroughly understands the need for the Golden Rules approach and is ready to implement and monitor it with determination.

Films that appeal to people's emotions can help to spark discussions and convey messages during information sessions or management training.

2.1.5 Ensure the entire organisation is mobilised to support the Golden Rules approach

When a company decides to implement a Golden Rules approach, it must ensure that its organisation can fully support it. This requires considerable time and resources. The more the teams are mobilised at the start, the higher the chances that the Golden Rules will be adopted and applied. Based on experience, the discussion group members highly recommend a participative approach for elaborating the Golden Rules.

Involvement of the entire organisation

Example

The company went to the effort of carrying out an in-depth study of its incidents over several years to justify choosing certain Golden Rules. Accidents, near-misses and hazardous situations are correctly reported and analysed.

The company shared its decision to implement a Golden Rules approach with employee representative bodies and, of course, the OH&S committee. These bodies must be strong partners throughout the process.

The company organised sessions with the teams to work on establishing the site's Golden Rules together. All echelons of management and all occupational groups are represented in the work groups.

The company planned information and training sessions within a relatively short time frame to tell everyone about the Golden Rules once they had been established. These sessions must give the teams the opportunity to speak up and even express any criticisms they might have, but always in a manner that is constructive for all concerned.

External contractor companies are included in this step. The company must share the need for change with them and include them in the process.

2.1.6 Involve the occupational groups and individuals

The Golden Rules must be applied by everybody, for the safety of all. According to the discussion group members, this leads to a special kind of challenge: that of addressing all groups, irrespective of their occupation, culture, language, and their level of maturity when it comes to safety. For example, the worldwide implementation of a Golden Rules approach by a global company is no simple undertaking. Another challenging example that was mentioned is having to raise awareness of the Golden Rules among groups that have not experienced a serious accident in a very long time.

Ways to get the work groups on board

Example

Those who initiated the process spent a great deal of time working with the communications department to create **graphics** illustrating the Golden Rules (simple pictograms, photos, images), to make them easier for as many employees as possible to understand.

The company takes into account any cultural differences when explaining to the work groups how necessary it is to adopt the Golden Rules. For this, local management/experts helped to **adapt the form and content of the message** to the different groups.

2.1.7 Give careful thought to a just and fair culture

A “just and fair culture” policy is needed if implementing Golden Rules. The two go hand in hand. Indeed, if such a culture is not already in place and if what has been described as “major” for preventing serious injuries and fatalities is to remain credible, a just, fitting, coherent and consistent system of recognition and sanctions is necessary.

The just and fair culture

Definition

A just and fair culture is evident when, within the company, the line between acceptable practices and unacceptable practices is clear and both elicit a response from the organisation.

This clear line must be discussed, examined and recognised by all members of the company.

The just and fair culture encourages a culture of transparency, i.e. it gives employees the possibility of reporting the existence of any hazardous situations, anomalies, errors or inadequate resources that may jeopardise the safety of an operation, and thus of preventing the occurrence of a major accident.

This is the essence of the Golden Rules approach, since the Golden Rules establish the boundaries of what is acceptable and what is not. A just and fair culture combined with a Golden Rules approach should make it possible for every individual to report any situation that presents a risk as a result of deviating from a Golden Rule, even if this was done in error. It should be made very clear that this just and fair culture applies to everyone, irrespective of their role and position within the company.

It is important to note that if the “just and fair culture” is poorly thought out and implemented, it can erode the climate of trust that exists between the stakeholders in the company and thus hinder the upward flow of information, the reporting of deviations or justifications for dispensation from applying the Golden Rules. Eventually, this policy could then lead to a significant drop in the level of compliance with the Golden Rules and of risk management and safety performance.

The existence of this policy is, however, essential. It should be applied gradually and take into account, as objectively as possible, the facts and any explanations given for the act. It is necessary, but it should be very well prepared and elaborated in collaboration with all the stakeholders concerned, and particularly by involving the OH&S committee (or equivalent bodies) and employee representatives. Under these conditions, it can be a safeguard against arbitrariness and even against legal proceedings.

A just culture policy from the very start

Key point

It is crucial to start thinking about the “just and fair culture” policy very early on in the process and to involve as many people as possible in its elaboration.

Summary: the shared safety vision and bringing meaning to the Golden Rules

Key point

- ▷ This step, which involves sharing the safety vision and bringing meaning to the Golden Rules, was somewhat neglected in some of the situations observed, even though it is more important than it might initially appear;
- ▷ Management plays an essential role in explaining the reasons behind the rules and the decision to introduce them. The commitment of all employees, including work groups and individuals, must be sought by involving them through measures suited to the context;
- ▷ The preservation of life is a shared value that can mobilise people if it is backed by ad hoc resources;
- ▷ The local cultural aspect, and particularly the attitude toward death, should be taken into account but this is not essential;
- ▷ The issue of contractor companies is crucial, even in this phase, since it is often within their ranks that serious injuries and fatalities occur. They must therefore be involved in this step;
- ▷ The assessment of the safety situation should be shared;
- ▷ Implementing a “just and fair culture” is crucial, if one is not already in place, to enable workers to distinguish what is acceptable from what is not, especially when it comes to the Golden Rules.

2.2 First-hand experience

How do you ensure the rationale behind the Golden Rules makes sense to everyone?

“ One month after receiving the results of our safety culture assessment, a fatal accident occurred in our company. One year later, to the day, we held a worldwide commemoration ceremony which marked the launch of our Golden Rules”. This had a strong psychological impact; after a fatal accident, the measure made sense! ”

How was this prepared?

“ For three months we “coached” the managers so that they, in turn, could prepare the sharp-end workers. The protocol was identical worldwide. They explained it all and made sure everyone understood. It was very operations-focused, driven by the leaders at the sharp end. ”

How did you get the teams to embrace this safety vision?

“ At the same moment, on each of our work sites, regardless of the location, in all the countries around the world where we are present, there was a manager saying that this should never happen again. Their role was to embody the vision, to explain why the Golden Rules are a key tool for each of us in preventing serious injuries and fatalities. ”

Examples of Golden Rules: Risk prevention 2 (Actual examples from companies)

- ▷ Protect yourself against falls from height and protect others against falling objects. Always secure your harness when working at height.
- ▷ Ensure collective protective measures are in place. E.g.: demarcation, props, lifting equipment, etc.
- ▷ All collective protective equipment must be in good condition, especially the gratings and guardrails.
- ▷ Always keep at a safe distance from mobile equipment.
- ▷ Stay out of the path of moving equipment.
- ▷ Keep well clear of any moving load or machine.
- ▷ Stand in a safe zone when you are near moving machines or equipment.
- ▷ Do not enter a barricaded area indicating that lifting is in progress.
- ▷ Do not work under or near power lines.
- ▷ Before performing hot work, make sure there is no fire or explosion hazard.
- ▷ Before ascending a structure, check that it is sound. Secure your ladder.

FIG. II.2.1 – Examples of Golden Rules: Risk Prevention 2

Train and coordinate a strong coalition for a successful implementation of the Golden Rules

3.1 The essence of the debates

Implementing Golden Rules is much too big of an undertaking for a management team working in isolation with just the support of the HSE manager, for example. Many such implementations fail due to a lack of internal support in driving and managing the project. That is why it vital for the company to train and mobilise a strong coalition, or in other words a group of allies from all levels within the organisation. This is the group that management will be able to count on to ensure the desired changes are implemented effectively and for the long term.

3.1.1 Identify all the key actors in the coalition

The actors in the coalition are those who can really drive the process. They should be chosen and approached based on their capacity to participate in building “change”. The different echelons of management, the HSE department and the social partners are of course naturally a part of this coalition. But this coalition can be opened up to other types of key actors and opinion leaders. And finally, other support functions besides the HSE department should also be involved as much as possible.

A local implementation committee

Example

In addition to a small steering committee, top management has identified actors within the organisation who will make up the local implementation committee (cross-functional working group) in charge of the process. This working group is made up of supervisors and managers, employee representatives, employees from the procurement, communications, HR, HSE, and engineering departments, external contractor companies, as well as opinion leaders from the different sectors and business units within the company.

3.1.2 Include the different echelons of management in the coalition’s inner circle

Management’s involvement in the implementation of this type of approach must be visible. It goes without saying that managers are expected to set the example when it comes to applying the Golden Rules, communicate on a regular basis about how important it is to adhere to them strictly and rigorously, ensure that the right conditions are in place so that it is possible to apply them, and react when it has been established that a Golden Rule has been broken. In short, they must be seen as leaders in this area.

Management involvement

Example

In their communications, managers remind workers that they all play a vital role in managing serious and fatal risks, and they stress the importance of applying the Golden Rules.

Management **recognises initiatives and decisions** that have contributed to compliance with the Golden Rules.

The first level of management is **exemplary** when it comes to applying the Golden Rules.

3.1.3 Train the echelons of management in enforcing the Golden Rules

Of course, training the different echelons of management is standard practice within companies. As part of their implementation process, companies develop and roll out training programmes focused on the Golden Rules. The primary aim is for the managers to assimilate the Golden Rules and the main tools associated with them, such as the policy for just recognition and sanctions. The idea is to provide managers with levers that will enable them to show strong leadership and thus encourage compliance with the Golden Rules within their teams.

Training programmes for managers

Example

The company has developed a training programme which includes role plays of accidents that occurred or were avoided depending on whether the Golden Rules were followed or not.

The company has implemented a four-day training course with a quiz at the end to test knowledge.

The company has chosen to focus its training on “commitment theory” so that managers learn the methods to adopt to obtain a commitment from their teams, particularly as regards the Golden Rules.

The company provides its managers with precise/real-life cases they can use as examples when communicating with their teams.

The company has set up a system whereby their managers’ training is recycled every three or four years.

3.1.4 Involve staff representatives and employee representative bodies in the process

Social dialogue is essential to make progress in the prevention of serious injuries and fatalities, as it helps to ensure that information is escalated, situations are handled, explanations are given, and discussions take place between the members of the company.

Among the themes that it is essential to address through social dialogue and with employee representative bodies, two points appear to be very important in the implementation of Golden Rules:

- ▷ Golden Rules which the social partners recognise as being applicable;
- ▷ Agreement on the mechanisms for recognition and sanctions (just and fair culture).

Open and regular dialogue about these matters is required between employee representatives, top management and the rest of the chain of command.

3.1.5 Include all other stakeholders in the coalition, notably the support functions and any contractor companies

Besides the different echelons of management and the social partners, the Golden Rules implementation strategy must take into account all stakeholders in a coalition of interests: procurement, communications, HR, HSE, engineering, contractor companies. Too often, these functions are forgotten in the Golden Rules implementation process. Yet, each will contribute to the success of the change plan.

Involvement of all departments

Example

The procurement and engineering departments are involved from the very start of the process, to facilitate the handling of situations where the modification, design or purchase of equipment and materials is required to make Golden Rule compliance possible.

The communications department is involved to help the people in charge of implementing the Golden Rules with the communication plan.

The people in charge of training are involved to help the HSE teams and management develop the Golden Rules training that will be delivered early on in the process.

The HR and legal departments work with management and the HSE team to establish the policy for just recognition and sanctions which the company will refer to, along with the internal rules, in situations where this proves necessary.

External contractor companies must also be involved. A specific review must especially be carried out with the most regular contractors in particular to address this matter. An inventory of Golden Rules systems must be drawn up when both the client company and the external contractor company have such a system in place. In particular, the recognition and sanctions policies of both partners must be as closely aligned as possible when it comes to the application of any Golden Rules they have in common. It is important to consider the fact that external contractor companies have different clients with different and varied Golden Rules, and to listen carefully when they mention the problems this can generate.

3.1.6 Identify the opinion leaders and give them a role in the coalition

Opinion leaders that have a strong influence on the work or occupational groups must be identified and their views heard. It is not their position within the organisation that matters; rather it is their ability to get the members of the organisation to embrace initiatives such as the Golden Rules. An opinion leader is an individual who, by virtue of their personality, recognised authority, expertise or the job they perform, is able to influence the opinions or actions of a large number of people.

Involvement of opinion leaders

Example

The company has clearly identified its opinion leaders and gives them a role in driving the change (running meetings, work group, whistleblower, intermediary, etc.). These opinion leaders are asked to champion the Golden Rules at the sharp end. Through their actions, they demonstrate the importance of applying the Golden Rules and they pay close attention to situations that pose particular risks.

Summary: the coalition to form

Key point

- ▷ Top management plays an essential role in explaining the reasons behind the rules and the decision to introduce them;
- ▷ The vision must be upheld by top management, but the strategy must involve the different actors in the coalition right down to the local manager who, from this phase onward, must be given the means to understand it and facilitate its implementation;
- ▷ Employee representatives and representative bodies must be involved in the implementation process;
- ▷ Including the support functions, the social partners, and external contractor companies in the coalition is important to ensure that the Golden Rules are successfully implemented and become firmly anchored within the organisation. This can take the form of a cross-disciplinary team in place for the duration of the project;
- ▷ Opinion leaders must be identified, given a role in the coalition, and time must be spent on preparing them.

3.2 First-hand experience

How might you illustrate the importance of a strong coalition in this type of undertaking?

“ Let me tell you a true story. During an external safety audit at an industrial site, there was a discussion between the OH&S committee members and the auditor, a former plant manager. The conversation shifted to the Golden Rules:

A member of the OH&S committee says: “Your Golden Rules...”

The audit manager replies: “No; our golden rules?”

The OH&S committee member says: “We apply your Golden Rules when they can be applied. They're not ours, because we've had no part in choosing them or implementing them.” ”

Examples of Golden Rules: Recovery

(Actual examples from companies)

- ▷ Intervene if a co-worker or third party is about to walk or stand under a load.
- ▷ Intervene when you see a co-worker in a dangerous situation.
- ▷ If in doubt, stop working and ask the most appropriate person for help.
- ▷ Exercise your right to stop work and notify a superior when you notice or find yourself in a high-hazard situation.
- ▷ Always secure your harness when working at height.
- ▷ Confirm the absence of energy (mechanical, chemical, electrical, fluids under pressure, etc.) before beginning work.

FIG. II.3.1 – *Examples of Golden Rules : Recovery*

Identify any obstacles to applying the Golden Rules, address them and organise a solution

4.1 The essence of the debates

“ Only impose rules that can be applied. ”

The Golden Rules must be applicable and applied at all times and in all circumstances. That is why it is crucial to go beyond the general principles behind the Golden Rules and agree on how the Golden Rules can work for everyone. To this end, any Golden Rules implementation should include a process for identifying and addressing situations that are likely to prevent strict compliance.

4.1.1 Identify the technical and organisational obstacles to applying the Golden Rules, during a transitional implementation phase

When a company decides to implement Golden Rules, it automatically commits to ensuring their applicability and guaranteeing that the technical and organisational conditions are in place to make strict compliance with these rules possible. Obstacles to applying the Golden Rules can stem from the technical design of facilities, equipment and installations (for example, a machine configuration that compels workers to adopt unsuitable body postures and movements, or the absence of anchor points for safety harnesses). Other obstacles can result from the way the work is organised (time limits, headcount, etc.), or from unexpected events occurring while work is being performed (equipment failure, weather conditions, equipment availability, change in work organisation, employee absence, etc.). Team supervisors and managers play an essential role in this phase and should be closely involved in choosing and establishing the finer details of the implementation.

Some of these obstacles can be anticipated; others are dealt with in the moment. Whatever the type of obstacle, the company must have an organisational structure in place that is capable of tackling them effectively, otherwise compliance with the Golden Rules will slowly but surely dwindle over time.

Introduce a transitional implementation phase

Key point

One important step is to introduce a transitional implementation phase. This phase starts before the effective implementation and continues for a period of time decided by the company based on the number of situations it anticipates it will need to address.

During this phase, the teams and the coalition members are mobilised to detect any situation likely to prevent strict adherence to the Golden Rules, inform their superiors of them, suggest any necessary modifications, and correct the situation as quickly as possible.

Finally, it is important for the company to add to its operational experience feedback on a regular basis, as and when its workers are faced with “unexpected” obstacles that render strict adherence to the rules impossible. This operational experience feedback should be shared with the teams to enable them to better anticipate situations and/or know how to manage them effectively.

4.1.2 Identify any conflicts or inconsistencies that might exist between the Golden Rules and other orders

It is often difficult to ensure that the Golden Rules don't conflict with the many orders that come from different sources. For example, as a result of certain incidents that have occurred on the site, a traffic management plan might authorise the use of a zone in which there is a risk of collision with a moving machine, thus contradicting the corresponding Golden Rule.

During the transitional phase, orders must be examined carefully to ensure there are no potential conflicts with the Golden Rules and that any decision-making systematically swings in favour of the latter.

4.1.3 Institutionalise the right to say STOP when the conditions for applying a Golden Rule are not in place

All companies agree on this point: every worker must be able to say "stop" freely and with confidence when faced with a situation in which it is impossible to adhere to the rule strictly, as it is set out.

The ability to say "stop"

Key point

The company accepts that the Golden Rules apply to all employees and may be invoked to justify refusing to work in a dangerous situation where the rules cannot be applied.

The company gives each employee access to a simple means of reporting issues without pressure from superiors, if exposed to a situation in which it is impossible for them to apply one or several Golden Rules.

Note, however, that just because every employee has the right to say "STOP", that does not mean they will.

The retrospective analysis of a number of serious accidents revealed that very often, for a multitude of reasons, the employees involved (sharp-end worker, supervisor/manager, external contractor) keep working even though the situation does not allow them to apply the corresponding Golden Rule.

There are many reasons for this, which makes resolving the problem difficult:

- ▷ *This is what I'm here for; it's my job;*
- ▷ *I think production is more important than safety;*
- ▷ *I'm not aware of the risks;*
- ▷ *I need to show my company that I'm a hard worker;*
- ▷ *I just get on with it;*
- ▷ *I think I'll always manage (my own skills and experience are more effective);*
- ▷ *Anyone would do the same;*
- ▷ *Not doing the work is demeaning; it sends the message that you're incompetent;*
- ▷ *I feel qualified/competent;*
- ▷ *I don't want to interrupt the operation because we'll fall behind;*
- ▷ *We don't have time; we can't afford to fall behind schedule;*
- ▷ *I'm worried about how my colleagues, superiors, customer will react;*
- ▷ *I don't know that I'm allowed to stop;*
- ▷ *I don't know that I must stop; I don't see the risk;*
- ▷ *My boss has seen me do it and hasn't said anything;*
- ▷ *The HSE officers are here; they'll see it or have seen it and haven't put a stop to it;*
- ▷ *Somebody's already said something to me about this;*
- ▷ *I need to push my boundaries when I'm doing routine work;*
- ▷ *I don't know any other way; Safety is not my thing.*

It often takes a lot of work and effort before the company is able to eradicate these accidents that might have been avoided if the worker or team had stopped in time.

4.1.4 **Decide on the decision-making process to use when there is some difficulty in applying a Golden Rule**

The decision-making process to use when there is some difficulty in applying a Golden Rule should be established and known by all. This should clarify how information is to be escalated via superiors or even via other means if necessary, and it should establish any delegations of authority that might be needed in order to decide on what actions to take in such situations. Details on how to gather operational experience feedback about such cases should be defined and the lessons learned must be used to refine the Golden Rules.

4.1.5 **Ensure there are special dispensations in place for the Golden Rules, along with a process for the reporting and immediate handling of any incidents or issues**

In a few very rare cases, a work situation may compel the company to dispense workers from following a Golden Rule. These highly exceptional dispensations can only be justified in very specific and extremely well-defined situations. They must have been approved and set down in writing in a group setting in the presence of the chain of command. Compensatory measures must be put in place to guarantee optimum control. Reporting these dispensations is strongly encouraged, to add to operational experience feedback and enable the company to take any actions necessary to avoid having to issue further such dispensations.

Special dispensations from the Golden Rules must not under any circumstances become a taboo subject, or there is a risk that over time they will start to be granted by individuals and become poorly controlled and hidden.

Managing a special dispensation

Example

The company makes provisions for special dispensations and has clearly established and communicated the criteria and the decision-making process that determine whether the dispensation is “inevitable”.

The company has designed a process which allows these special situations to be handled safely and efficiently by a designated group of people.

As soon as a situation requiring a special dispensation is identified, the company gathers a decision-making committee composed of individuals who are empowered to make these types of decisions, and as a group they decide on the strategy to adopt. The dispensation and compensatory measures are set down in writing.

The company encourages the reporting of situations where a dispensation was issued, in order to improve the situation and avoid having to grant a further dispensation in an identical situation.

The company takes steps to set up a system for recording and dealing with situations in which there are conflicts in applying the Golden Rules.

Summary: obstacles to applying the Golden Rules

Key point

- ▷ To be credible, the Golden Rules must be applicable in all circumstances;
- ▷ Any situations in which it is impossible to apply the Golden Rules must therefore be identified, handled transparently, and known to all;
- ▷ The process enabling operational staff to report the impossibility of applying one or several Golden Rules, and stop or shut down any operations under way if necessary, must be established and shared with all concerned. Decision-making (including who has the authority to decide) should be covered in the process;
- ▷ The conditions for granting a special dispensation from applying the Golden Rules must be established and shared with all concerned.

4.2 First-hand experience

Process line to lock and tag:

“ The lock and tag conditions are not required due to a lack of equipment (tap, drain, etc.). ”

In this case, compensatory measures must be taken for locking and tagging until the equipment is repaired or upgraded.

Examples of Golden Rules: Mitigation *(Actual examples from companies)*

- ▷ Sharp-end operations: procedures must be established for contingency plans.
- ▷ Know where all safety equipment and features are located on site (assembly point, emergency exits, shower, telephone, fire extinguisher, etc.).
- ▷ Personal protective equipment (PPE): everyone must wear personal protective equipment that is appropriate to the zone and the work being performed.
- ▷ Wear your personal protective equipment (PPE).
- ▷ Protective equipment: use the protective equipment that is appropriate for the job at hand.
- ▷ General and specific PPE must be worn to access facilities and perform work. The rules governing PPE use are clear and communicated to all concerned.
- ▷ Wear your seat belt and keep to the speed limit.
- ▷ Agree to undergo health monitoring for exposure to hazardous chemicals. If in doubt, speak to your occupational health physician. Wear a film badge dosimeter and carefully avoid any risk of contamination.
- ▷ Always wear a life jacket when working near water in the absence of collective protective equipment.

FIG. II.4.1 – *Examples of Golden Rules: Mitigation*

Encourage work group appropriation of the Golden Rules

5.1 The essence of the debates

For the company, implementing Golden Rules is a symbolic action. The changes to practices, mindsets and ways of doing that accompany such an initiative are major. Any person working either regularly or more sporadically on site must fully embrace these changes.

If the previous steps were followed, the Golden Rules can be introduced and there is every chance that the workers will support their implementation. The company must then organise for the rules to be upheld and kept front of mind within the work groups.

5.1.1 Mobilise the chain of command to enforce the rules within the work groups while taking into account their cultural differences, and support managers with a communication plan that is regularly updated and improved.

Golden Rule appropriation by the workers requires a great deal of active involvement from management. Management must uphold these rules through actions such as safety meetings, safety visits, audits and so on. The current situation must be taken into account when planning such actions, particularly the cultural differences that exist between the groups and, more broadly, the countries concerned.

To help managers uphold the Golden Rules, the company must design and implement a communication plan targeting all company employees. Several best practices were shared during the discussion group meetings.

The Golden Rules communication plan

Example

Some companies adapt their communication according to whether they are addressing managers or workers, while others prefer to use similar communication for both groups.

The company plans to adapt its communication, and especially its vocabulary and chosen examples, according to the occupations, roles, sites, or even countries that make up the group, to ensure a greater degree of appropriation by all.

The company has introduced a “Golden Rules” logo.

The company takes into account cultural differences to align its messages and communication with the values and beliefs of the employees concerned.

The company relies heavily on local management to communicate about the Golden Rules, leaving them some latitude to adapt the communication to the teams.

The company has elaborated its communication plan to ensure that, each month, the focus is on one of the Golden Rules.

The employees have adopted a ritual of regularly communicating about the Golden Rules.

In addition to the communication plan, companies very often hand out various materials outlining the Golden Rules.

Communication materials

Example

The company gives employees handy pocket-sized cards outlining the Golden Rules, so they can refer to them at any time.
To support its communication plan, the company distributes leaflets on a large scale, puts up posters, photos, cartoon strips, and releases videos, films or other promotional materials (day planners, mousepads, usb sticks, etc.).

5.1.2 Structure team meetings and periodic huddles around the Golden Rules and ensure everyone understands why they are in place

Managers should systematically use the team meetings, huddles and talks held on a regular basis (safety briefings, safety moments, toolbox talks, 15-minute safety meetings, etc.) to discuss the Golden Rules. The frequency and duration of these meetings can vary from one company to another. Within teams, the managers are responsible for communicating and initiating discussions about a number of messages relating to the Golden Rules and for identifying any difficulties in applying them.

Meetings about the Golden Rules

Example

The company understands that it must make every effort to train managers in facilitating toolbox talks and 15-minute safety meetings.
During team meetings, the manager identifies any difficulties encountered in implementing the Golden Rules.
Team meetings are designed as a time to discuss any thoughts relating to the application of the Golden Rules, how to handle deviations, and the best practices identified by the members of the team.
The company is careful to include “non-operational” employees (i.e. support functions and logistics), since they are often overlooked to the detriment of safety.

5.1.3 Pay special attention to the Golden Rules during visits by management

Overall, it would seem that managerial visits are becoming more professionalised. Where the Golden Rules approach is concerned, they are an opportunity to ensure that the rules are properly understood. They are also an opportunity to remind workers of some of the rules if need be, and for managers to be present at the sharp end to identify any obstacles to their application, address any deviations, and encourage compliant behaviours.

5.1.4 Encourage employees to look out for one another’s safety and motivate them to take appropriate action when their co-workers find themselves in hazardous situations

“Shared vigilance”, or looking out for one another, is an approach that is gradually gaining ground in the industrial sector. Its aim is for each worker to step in and assist a co-worker or even a manager if the latter is exposed to a hazardous situation, to encourage them to adopt sound safety practices.

It is therefore highly complementary to the Golden Rules approach, since it is in the company’s best interest to motivate employees to intervene when one or several of the Golden Rules are being breached.

Looking out for one another, or shared vigilance

Example

The company has implemented a mutual observation programme aimed at training employees to intervene effectively when their co-workers are not applying the Golden Rules.

5.1.5 Ensure each individual is proactive at spotting and identifying situations where it is difficult to apply the Golden Rules

It is crucial for workers to be able to spot the situations in which it is difficult to apply the Golden Rules. What's more, these situations must be reported to management and addressed promptly to prevent rule bending from becoming the norm. The company must really insist on this from its workers and implement a suitable system to ensure that information flows upward within the organisation.

_____ A system for upward information flow _____

Example

The employees have access to a system that records cases where there is a conflict in applying a Golden Rule.

5.1.6 Implement an incident reporting and stop work procedure such as the "STOP card" or enforce the one(s) already in place

In addition to being a tool, this is a symbol. Often represented by a green/red card signed by the company's top management, to avoid an accident this procedure empowers any employee who witnesses a hazardous practice, or a situation that exposes a co-worker, superior or external contractor to danger, to react immediately to encourage that person to prevent the risk and to let them know that they are breaching a Golden Rule.

_____ A "Stop Card" linked to disruptive elements _____

Example

A company has developed methods for preventing the risks linked to disruptive elements which may hinder compliance with the Golden Rules. This system requires sharp-end workers and/or managers to stop any operations under way if a combination of three "disruptive elements" is present.

For example, "a young inexperienced worker", "the first time using a piece of equipment after maintenance", "significant pressure from sales"; this translates to three "amber lights".

This type of "Stop Card" triggered by an accumulation of risk factors, in the case of a situation presenting serious or fatal risks, leads workers to stop, reassess the risks, and take appropriate measures.

5.1.7 Use a mentoring system and involve mentors in teaching new recruits the Golden Rules¹

Many companies have introduced a mentoring or buddy system to help new recruits learn and gradually adopt the essential safety measures and particularly the Golden Rules, in addition to the training they received during onboarding.

_____ New recruits _____

Example

New recruit onboarding and induction (training of new arrivals to an operation or work site) content very largely includes a segment on the Golden Rules.

The company is seeking to professionalise the mentoring process further by having a high-level manager present the new recruit their accreditation after six months.

The company has given new recruits with fewer than 6 months of service a green "short worker" helmet to ensure they are spontaneously assisted by the more experienced workers.

1. The Golden Rules can be made a factor of various stages in career progression.

5.1.8 Implement “quick wins” to inspire workers to keep following the rules

A Golden Rules approach is a symbolic undertaking (strategic, breaks with the past, has a significant impact on the safety culture) for the company which mobilises all employees. Efforts must be sustained long term. Since it is a symbolic undertaking, it is also a long-term one. Changes to safety practices and performance are not immediately visible to employees. Along the way, there are many factors that can lead to failure or loss of motivation (changes to top management, demanding project run concurrently, major accident that has employees doubting the entire approach, mishandling of a rule violation, etc.). In short, a Golden Rules approach can be fraught with obstacles.

To counteract this phenomenon, it is important for the company to regularly think up and implement actions with quick and visible results in order to keep everyone motivated and mobilised.

A quick-win action can be:

- ▷ A change-related action whose success is visible by all concerned and which has a positive effect for them;
- ▷ An action that is quick and easy to implement (low cost and requiring very little investment in terms of human, technical and organisational resources).

These actions can take the form of small challenges between teams involving new initiatives, giving recognition for positive practices, films with testimonies, the creation of promotional objects, etc.

5.1.9 Ensure social dialogue about the Golden Rules is open

Dialogue with the OH&S committee or equivalent must be maintained throughout the Golden Rules implementation process. This implementation is a consensual objective in labour relations inasmuch as it is an effective means of preventing serious injuries and fatalities. The dialogue must be open and constructive, involving regular discussion of the reality at the sharp end and any difficulties in enforcing or following the Golden Rules. These difficulties must be discussed and addressed collectively.

Works council involvement is also necessary, particularly since organisational matters fall under its purview. It can also be important to involve labour unions to ensure better reporting and handling of any issues with enforcing or following the Golden Rules.

Summary: work group appropriation of the Golden Rules

Key point

- ▷ Work group appropriation of the Golden Rules is essential. All echelons of management must actively ensure this;
- ▷ Team meetings, safety visits by management, and opportunities for interaction, including with the support functions, are all good times to discuss the Golden Rules;
- ▷ Encouraging workers to look out for one another's safety and implementing stop work processes for situations where it is impossible to apply the Golden Rules increases the credibility of the initiative and thus the likelihood that workers will embrace it;
- ▷ Mentoring and supporting new recruits helps to make the rules stick;
- ▷ Quick-win actions, where results are visible in the short term, help to ensure the Golden Rules are followed and stay front of mind;
- ▷ Open social dialogue about the Golden Rules is also a good base for successful rule appropriation.

5.2 First-hand experience

How did you encourage the appropriation of the Golden Rules?

“ We applied the Engagement Theory. Because authority, persuasion, training and information are essential, but their effectiveness is limited. In collaboration with Professor Robert-Vincent Joule, we designed a specific meeting model to engage employees and incite them to follow the “life-saving rules”. We wanted this to be an opportunity for participative group discussion about safety, about our activities and the risks they present. ”

What exactly did you cover in the group discussions?

“ First, the work group would watch a short video of an accident and its consequences to illustrate the “life-saving rules”, trigger an emotion and get everyone thinking. Then, we would identify and analyse all the elements that may have led to breaching the rule: the circumstances, the technical, organisational or behavioural factors etc. to reveal concrete improvement actions, so as to arrive at the expected behaviours. ”

What did you do to ensure the rules really became ingrained and to encourage compliant behaviour?

“ Getting ten people together for an hour encourages expression and engagement. To ensure that the Golden Rules are adhered to long term, you have to start by following through on the actions that emerged during the discussions. These rules must be the focal point of management’s exchanges, decision-making, and when they are championing safety, during sharp-end visits for example. The managers are key; they must be strongly committed to the approach. Its credibility hinges on this. ”

Can you tell us about the unexpected positive effects of this type of engagement process?

“ This approach gives sharp-end workers the primary role in ensuring their own and others’ safety. It introduces the notion of looking out for one another’s safety (shared vigilance), which is essential when a breach of the “life-saving rules” is observed. It is an opportunity to get employees to speak up about work organisation, behaviours, technique... and also, a chance to teach different hard or soft skills. This will also enable us to make some progress towards initiative-based safety, which is essential for developing the organisation’s resilience. ”

Examples of Golden Rules: Common prerequisites 1

(Actual examples from companies)

- ▷ You are responsible for your own safety and that of the people around you.
- ▷ Read and understand instructions. Follow them and make sure everyone else does too.
- ▷ Never begin an operation if unprepared. Never improvise.
- ▷ Always look out for the safety of your co-workers and any third parties.
- ▷ Take SIMOP risks into account when preparing your intervention (those you generate or those you and your co-workers or third parties are exposed to).
- ▷ Take other people's activities into account when planning and performing your task.
- ▷ Take safety into account when preparing and carrying out your work.
- ▷ Operating procedures must be written down, up to date and saved.
- ▷ Maintenance work: safety measures resulting from a risk analysis must be strictly observed.
- ▷ Only start working once you have properly understood the task at hand. Perform only the task set by your superiors.
- ▷ Work only on tasks you are qualified to perform and which have been assigned to you by your superiors.

FIG. II.5.1 – *Examples of Golden Rules: Common prerequisites 1*

Establish and implement a recognition and sanctions policy that is perceived as just to ensure adherence to the Golden Rules

6.1 The essence of the debates

To improve safety, positive reinforcement must be given for safe behaviours and it must be made clear to everyone that deliberate violations of the Golden Rules will not be tolerated. To this end, the company must have a process in place for giving recognition and for reacting in a fair, coherent, consistent and transparent way, with negotiated criteria and forms of action decided in advance. Indeed, *“the forms of recognition, whether positive (compliments, rewards) or negative (reprimands, sanctions) which actors have witnessed until now will determine how much trust they place in management, as well as the behaviour they will adopt if faced with a dangerous situation”*¹.

Just culture and Golden Rules

Key point

To be accepted and shared within the teams, the just culture process must be championed by the highest level in the company and, preferably, established at the same time as the Golden Rules, in consultation with all stakeholders, particularly employee representatives.

6.1.1 Work with employee representatives to establish the just recognition and sanctions policy

A recognition and sanctions policy which employee representatives are involved in is highly productive, but few companies can attest to this. Although respectable, too strong a stance on the part of the stakeholders can make moving towards a common vision difficult and reinforce the status quo:

- ▷ Managers are generally in favour of negative sanctions, as they find this lever effective. They tend to minimise positive recognition and fear that the subject will only be broached from a financial perspective;
- ▷ As for employee representatives, they are generally opposed to negative sanctions, believing them to be dangerous because they can jeopardise transparency and lead to the manipulation of reality. They prefer to look further into the root causes of behaviours: understanding how and why a person was “driven to error”. Conversely, they are in favour of giving recognition, which they feel is severely lacking in the company.

The issue is therefore a stumbling block within companies and it often ends in top management establishing the Golden Rules alone in “their little corner” and then having great difficulty getting workers to adopt them.

A few companies have been successful at ensuring that all groups (occupations, management, labour unions) were represented in the work group in charge of elaborating the policy using a participative approach.

1. The ICSI “Safety Culture” working group (2017). *Safety Culture: From Understanding to Action*. Issue n° 2018-01 of the *Cahiers de la Sécurité Industrielle* collection, Institut pour une Culture de Sécurité Industrielle (ICSI), Toulouse, France. Available as a free download from: <http://www.icsi-eu.org/>

To achieve this, they spent a great deal of time on reaching a consensus regarding the ultimate benefits of implementing such a policy.

Working in this way gives the company the best chance of implementing a process that is known, understood and accepted by all, and through which:

- ▷ It demonstrates that it values exemplary and compliant behaviour;
- ▷ It recognises the right to make mistakes, encourages transparency and fosters a climate of trust;
- ▷ It reacts fairly in the event of a violation, by distinguishing between what the sharp-end worker, management and the other actors in the organisation are each responsible for;
- ▷ It only sanctions when doing so is justified.

Some other basic rules were largely followed when elaborating the policy:

- ▷ Don't underestimate the time it takes (a year and a half on average);
- ▷ Constantly double-check legal and regulatory requirements and compliance;
- ▷ Do not implement until the policy has been tested in real-life situations (confirm that the tools are effective).

6.1.2 Give recognition when the Golden Rules are followed properly

In many respects, recognition or positive reinforcement has a lasting effect on practices. This is true for individuals, work groups, the sharp end, management, the support functions, internal employees and external contractors. Among other things, it can:

- ▷ Foster a positive climate conducive to the emergence of safe behaviours aligned with the Golden Rules;
- ▷ Encourage the teams to keep up safe behaviours;
- ▷ Promote sharing, capitalisation and collective progress;
- ▷ Show individuals that their contributions are valued and that they are seen as professionals with a concern for safety.

If the recognition of employee contributions is unbalanced in favour of negative sanctions, management creates a major reason for team disengagement. To encourage compliance with the Golden Rules, the company should lean more toward positive recognition than negative sanctions. Positive communication about cases where accidents were prevented by following the Golden Rules is also highly recommended.

This recognition should be underpinned by a structured method and communication established in advance by management, the HR and HSE departments, the employees and their representatives.

Behaviours that lead to receiving recognition

Example

Recognition can be given for the following behaviours (non-exhaustive list):

- ▷ Suggesting a technical and organisational improvement that supports the application of the Golden Rules;
- ▷ Securing a "high-risk" zone in which a Golden Rule cannot be applied;
- ▷ Getting personally involved and setting the example when it comes to the Golden Rules;
- ▷ Intervening personally to stop a risky situation;
- ▷ Reacting to rule violations or correcting an anomaly;
- ▷ Performing a "last-minute" act that "saved a life";
- ▷ Mentoring a young recruit with a focus on the Golden Rules, etc.

6.1.3 Impose just and fair sanctions when fundamental rules are broken

The negative sanctions issue never fails to trigger reactions ranging from “*we don’t sanction enough!*” to “*sanctions are frequent but not always fair*”. Everyone agrees that “*it’s a tough issue and there is no black or white!*” Sanctioning violations of fundamental rules shows that such behaviour is unacceptable. The aim is thus to ensure that the behaviour will not be repeated, either by the sharp-end worker in question or by the work group.

There are a number of key principles to know and share before taking such an action. For such a sensitive subject, we will draw on a number of elements presented in previous publications from ICSI’s *Thoughts on Safety Culture* series and the *Cahiers de la sécurité industrielle* collection².

Behaviours that lead to a sanction

Example

Where negative sanctions relating to the application of the Golden Rules are concerned, the situations in which the rules must be applied should be made perfectly clear and this can be illustrated by examples observed in certain companies:

- ▷ Perfectly identified, deliberate non-compliance with Golden Rules -- for example, smoking anywhere when the rule clearly states that smoking in a refinery is prohibited outside of dedicated areas -- leads to a systematic sanction;
- ▷ The following are also sanctioned: dishonesty, repeatedly flouting the Golden Rules (not wearing a helmet, exceeding the speed limit, manager not setting the example), and hiding key information or covering up accidents and near-misses.

These examples are illustrations of what is done in certain companies; they are not common to all companies. The purport of this *Cahier* is not to set guidelines to follow, but rather to show why a policy is needed in this area.

The company must therefore establish the conditions for dealing with deliberate Golden Rule violations, in keeping with its own internal rules and policies, and grade the sanctions based on their potential impact and their occurrence.

Sanctions are made explicitly

Key point

All sanctions must be made explicitly clear if they are to be accepted.

The company’s just response policy must distinguish between this type of deliberate, repeated behaviour and unintentional errors.

Applying a sanction to an isolated (unintentional) error causes a great deal of tension within the company and weakens the chain of command’s credibility. Above all, it can lead to “errors” not being reported and this in turn can have a negative impact on safety.

No hasty sanctions

Key point

Automatically giving out sanctions for deviations from the Golden Rules can be counterproductive when it comes to safety, because it prevents reflection on the conditions in which the deviation occurred.

If the policy for sanctions and for analysing deviations is perceived as just, it will contribute to the site or company’s safety culture.

In this regard, the role of the HSE manager is particularly important. The HSE manager ensures that decisions are not taken hastily, particularly those relating to potential sanctions for non-compliance with the rules. They make sure that the context and any socio-organisational factors are taken into account.

2. Sedaoui, A. *Systematic sanctions are not the best approach to change the behaviour of a person who does not respect the rules*. *Thoughts on Safety Culture*, issue n°14, Institut pour une culture de sécurité industrielle (Institute for an Industrial Safety Culture), Toulouse, France. Available as a free download from www.icsi-eu.org

Daniellou, F. *Les facteurs humains et organisationnels de la sécurité industrielle : des questions pour progresser*. Issue 2012-03 of the *Cahiers de la Sécurité Industrielle* collection, Fondation pour une Culture de Sécurité Industrielle (FonCSI), Toulouse, France (ISSN 2100-3874). Available as a free download (in French) from www.foncsi.org

Sanction effectiveness and the long term

Key point

The question that needs to be asked is whether sanctions are effective for changing unsafe behaviours. Experience shows that although sanctions can be effective in the short term, they have no long term effect on the deeper causes of the behaviour.

6.1.4 Ensure that root cause analyses of deviations from the Golden Rules are of a high standard

To avoid non-compliance with the Golden Rules, it is essential to understand the reasons that can lead to it. The behaviour of sharp-end workers is very strongly influenced by their work environment and by the organisational and human factors that characterise this environment. If unsafe behaviour is observed, the most effective way to prevent it being repeated is to eliminate the conditions that produced it.

For any deviation from a Golden Rule, an analysis needs to be carried out to identify the characteristics of the situation which may have contributed to an inappropriate decision or action. This implies taking the time required for the analysis and, if possible, assigning the task to employees trained in analysis, in order to look beyond the immediate causes and seek out the root causes.

Depending on the case, the analysis should, for example, reveal the major role played by the direct supervisor/manager, the impact of a poor organisational or strategic choice, unsuitable indicators, a normalisation of deviation implicitly accepted by all, subpar working conditions which management is aware of but has not addressed, conflicting orders or instructions, or other unidentified latent causes.

The appropriate response following unsafe behaviour should be to consider and address the contributions of all levels within the organisation. Otherwise there is a risk that the organisation will remain blind and deaf to its own failings and miss out on the opportunity to correct them.

Summary: a just recognition and sanctions policy

Key point

- ▷ When implementing Golden Rules it is essential to clarify what is unacceptable, such as deliberate violations, and what behaviours should receive recognition and encouragement.
- ▷ For a just culture implementation process to be sound and credible, it must involve all stakeholders, and employee representatives and institutions first and foremost, and it must comply with current local legislation and regulations.
- ▷ It is important to give recognition for good practices in applying the Golden Rules (positive reinforcement) and sanction any deliberate violations.
- ▷ No hasty decisions should be made. Rather, an in-depth analysis should be carried out of the causes leading to deviations from the Golden Rules.

6.2 First-hand experience

What influences whether a recognition and sanctions policy will be perceived as just and/or fair?

“ It should be predictable and clear. Workers should know what the repercussions will be for what they do. We chose to implement a four-question assessment tool to distinguish between error and misconduct. If misconduct is identified, a sanction must be applied systematically. On the other hand, we also clearly identified three types of behaviours that are expected and therefore worthy of recognition. ”

How did you elaborate your recognition and sanctions policy?

“ We wanted something that was easy to use. Where sanctions are concerned, their severity is determined based on the potential risk involved in the event or situation. As for recognition, we established a core framework by defining three behaviours that were expected, as well as what form the corresponding recognition would take: ”

1. Follow the rules and you will receive recognition and encouragement;

2. Help improve HSE performance and you will be rewarded;

3. Save a life and top management will cite you as an example to follow!

We gave each entity some degree of freedom to adapt this policy, particularly with elaborating and managing their “incentive³ programme.”

How did you then go about implementing it?

“ This policy, developed to support and provide a framework for the application of our Golden Rules, was implemented at the same time as the latter. Though training, the managers acquired tools to help manage their staff's behaviours.”

Examples of Golden Rules: Common prerequisites 2

(Actual examples from companies)

- ▷ Maintenance work: safety measures resulting from a risk analysis must be strictly observed.
- ▷ Think before you act (STOP, pause & check), for your own sake and others’.
- ▷ Work only on tasks you are qualified to perform and which have been assigned to you by your superiors.
- ▷ Read and understand instructions. Follow them and make sure everyone else does too.
- ▷ The PPE required in a restricted area must be clearly posted.
- ▷ Only move around and work in secured and authorised areas.
- ▷ Do not enter a demarcated area.

FIG. II.6.1 – Examples of Golden Rules: Common prerequisites 2

Integrate the Golden Rules for the long term and embed practices

7.1 The essence of the debates

Because this is a programme for preventing serious injuries and fatalities, the company must embed these new practices which contribute to controlling the risks involved in its activities, by making them part of its standards.

7.1.1 Ensure everyone is aware that “A golden rule must be kept alive if it is to save lives”

The Golden Rules must be embedded into the company culture for the long term so that safety practices become ingrained. Looking to the long term also requires checking whether the approach is yielding results and if implementing Golden Rules will pay off over time. Sometimes, this can be difficult to gauge and the entire process can be jeopardised by the occurrence of a serious accident. But, according to visit and audit findings, practices seem to be improving. This impression is also generally shared by the discussion group members.

Several questions arise: By what indicators can the success of the Golden Rules implementation be gauged? How do we ensure the approach doesn't run out of steam? How do we keep enough momentum going to maintain practices at a good level and avoid them gradually becoming eroded by routine or by the weariness of employees?

7.1.2 Update the Golden Rules to keep them fresh in everyone's mind

While implementing Golden Rules was or is a way of getting people motivated about prevention, everyone knows that such measures can run out of steam. Companies with sufficient operational experience feedback have begun to take this risk into consideration. In many cases, they have added new Golden Rules which the entities deem useful. Similarly, these companies chose to do away with certain Golden Rules once they were sure that these were being applied by all employees in all circumstances.

7.1.3 Teach the Golden Rules to new hires as part of their onboarding and job training

The company needs to consider incorporating the Golden Rules into the new employee orientation or onboarding process and job training. As soon as a new employee is hired, it is essential for the company to put all the right conditions in place to ensure the new hire is committed to safety and to enable them to quickly assimilate the Golden Rules. During onboarding, they should be taught and exposed to the values, rules and ways of the company of which employees are particularly proud. These must be presented as being an integral part of professionalism.

Furthermore, the company must schedule regular feedback and review sessions with the new hire, to address any issues they might have with applying the Golden Rules, answer their questions, help them respond to risky situations, and support them in their reactions to their co-workers or direct superiors, for example.

Reviews with new hires

Example

The company schedules formal feedback and review sessions:

- ▷ generally an initial review after one month,
- ▷ and a second after three months.

7.1.4 Use first-impressions questionnaires or reports

Perception surveys

Example

The company conducts perception surveys to identify any differences that might exist between the managers' and the sharp-end workers' perceptions of how the Golden Rules are being applied.

7.1.5 Include a reference to the Golden Rules in the analysis of incidents/accidents and of situations in which a Golden Rule saved a life

What do minor accidents, incidents and near-misses tell us? What information do they give us about the conditions that either prevented a Golden Rule from being applied or led to the rule being broken?

Accident, incident and event analysis can reveal the recurrence of certain “ingredients” which lead to cases of non-compliance with a Golden Rule or to an incorrect application of said rule. The company must have a good incident analysis process in place enabling it to determine whether some of these “ingredients” are particularly present, which would indicate a fragility to be addressed as quickly as possible, and to draw lessons for the implementation of the Golden Rule.

The company must update their lessons learned analysis by systematically including within it the cases where applying a Golden Rule resulted in avoiding an accident, saving a life, or “enabling a worker to make it home to their family after work”. Demonstrating the usefulness of a Golden Rule is just as effective as showing situations where the Golden Rule was not followed correctly. It is a very powerful lever for encouraging safe practices.

7.1.6 Introduce and share indicators to show the success of the Golden Rules implementation

Given the dynamic aspect of the process undertaken by the company, it is important for its evolution to be measured continuously and its effects more sporadically. This should enable the company to adjust its actions in order to achieve the desired outcomes.

Indicators can be established by the steering committee, but they can also be elaborated as a group by involving a larger coalition. Although it takes longer, the advantage of this method is that the indicators will be more meaningful to the employees.

The discussion group's work revealed the use of a few suitable indicators, such as:

- ▷ The verification of points specific to the implementation of the Golden Rules during audits;
- ▷ Percentage of compliance with setting up physical (e.g.: guardrails) or organisational barriers relating to Golden Rules or “Fundamentals”.

7.1.7 Implement Golden Rule application audits as part of a general evaluation system

It is crucial to ensure that a credible process is in place to verify that the Golden Rules are being applied, and that lessons can be drawn from it in terms of any good initiatives or deviations observed. This verification process must be organised. To this end, some companies enlist the help of their workforce via an audit programme with a twofold objective to confirm that the Golden Rules are applicable, and to verify that practices

are compliant with the Golden Rules. In the majority of cases, the findings of these audits are presented to **the company's top management and help them to adjust their strategy**. The audits generally focus on the conditions necessary for an effective implementation of the Golden Rules. They may be conducted by members of the HSE department, by the managers of other entities, or by peers. This must be managed in line with operational experience feedback processes and the discussions held with the teams about this topic. The primary aim must be the pursuit of improvements to prevention.

Golden Rule application audits

Example

The company set up a team of Golden Rule auditors to measure the actual implementation of these rules at the sharp end. A report is submitted to top management on a regular basis.

The company implemented an audit system assessing health and safety within the entities based on five criteria, with a particular focus on the Golden Rules. It assigned a large number of auditors to this task.

The company conducts targeted audits – during pre-commissioning reviews, for example -- that include the Golden Rules and through which they seek to identify possible disruptive elements.

Summary: embedding practices for the long term

Key point

- ▷ Ensure that the “Golden Rules effect” lasts and becomes an integral part of the company’s day-to-day operations to avoid falling back into old habits and patterns;
- ▷ Updating and adjusting them to take into account feedback and lessons learned is a good way to get everyone refocused on them;
- ▷ Full training in the Golden Rules must be provided to young recruits and new hires;
- ▷ Include them in regular staff quizzes, surveys, first-impression reports, and discussions during sharp-end visits, to emphasise their prime importance;
- ▷ Set up a general system for measuring and monitoring their implementation and appropriation, using indicators, audits or inspections that are conducive to a successful implementation.

7.2 First-hand experience

How did you embed your Golden Rules in your practices for the long term?

“ We established “10 life-saving rules”, with 50 critical requirements. After their implementation at the sharp end, we arranged regular audits: a representative of the audited business unit and an auditor working within the Group but not for the audited business unit assess the Group’s sites and worksites based on a three-year plan. Most activities are audited at least every three years, or much more frequently depending on the results of the audit. On average, we conduct 60 audits per year. The audits are highly focused on operations and the sharp end. Assessing the degree of compliance and formalising the findings takes two days at the most. ”

What are the benefits for the sharp end?

“ Each site receives the results of its audit and its level of compliance in a clear, operational and objective manner. It can then take steps to implement any necessary corrective actions and request a new audit. To motivate managers, we indexed their bonuses to these results during the first years of implementation: if the site achieved a compliance rate of more than 90%, the bonus amount increased. These days, this measure is no longer widespread because our high-risk prevention culture has evolved. It is still effective in the places we deem it necessary. ”

How did you achieve lasting performance improvements?

“ By being firm on one fundamental principle: work had to stop on sites with an insufficient level of compliance... until concrete improvements were made. At the launch, the approach and the decisions of top management were made very clear. Now, yearly, we use operational experience feedback to refine and adjust our 50 critical requirements according to our needs. ”

What has changed?

“ The safety culture has progressed. A blunder in our internal communication proved this to us. In an article, we had used an archive photo of a site in which many safety failures could be observed. This photo had been taken prior to the introduction of our “Life Saving Rules” and these failures had since been corrected... but a number of managers called to warn us about how dangerous the situation was. Our “AZDP Plan” has become the backbone of our actions in the field of safety. ”

Examples of Golden Rules: Controlling disruptive elements

(Actual examples from companies)

- ▷ Restrictions to telephone use on worksites must be observed.
- ▷ Never use your mobile phone while driving.
- ▷ Never handle your mobile phone or other communication devices while driving.
- ▷ Management of change on site (MOC). Risk analysis procedures – Communication.
- ▷ Change management: no technical or organisational changes without prior authorisation.
- ▷ Drugs and alcohol prohibited on site.
- ▷ Never work or drive while under the influence of drugs or alcohol.
- ▷ Never drive while under the influence of drugs or alcohol.
- ▷ No drugs or alcohol while working or driving.

FIG. II.7.1 – Examples of Golden Rules: Controlling disruptive elements 1 (fixes)

Ensure synergy with equivalent contractor-company processes and vice versa

8.1 The essence of the debates

There are numerous external contractor companies working at plants and industrial facilities. In some sectors, close to 80% of hours worked are outsourced. In others, few activities are outsourced, but the ones that are are particularly risky (e.g.: electrical work). In many ways, implementing a Golden Rules approach within a company that outsources is a means of improving the safety of the contractor companies' employees. It is always a means of significantly easing relations between these actors, and that is crucial in a high-risk industry. But what happens when the external contractor company has its own set of Golden Rules? How do we successfully combine them?

8.1.1 Engage in constructive dialogue to confirm the convergence/coherence of the two sets of "Golden Rules"

Most external contractor companies work for several clients that can be from very different industrial sectors and/or a same sector but with very specific activities or safety rules. The major difficulty external contractor companies face is therefore adapting to each of their clients' Golden Rules.

It is rare for the two sets of rules to be completely incompatible. Likewise, it is rare for Golden Rules to diverge completely from one client company to another. They usually have the most serious risks in common (fall from height, fire, burns, crushing injuries, contact with hazardous materials, traffic, etc.), even if the different occupations have their own set of characteristics to take into account.

Close cooperation on the subject of the Golden Rules is therefore necessary. This should translate to joint or coordinated actions between the client company and its external contractors. Engaging in constructive dialogue is therefore imperative, to align views on these issues and reveal any areas where the two sets of rules are complementary, while retaining any particularities relating to the respective fields of intervention.

Some rules cover the same situations. After discussion they should therefore be kept as is, even if their wording may differ, in order to facilitate and simplify their appropriation by the external contractor companies' workers.

It is worth pointing out, however, the case of occasional or "freelance" contractors who are hired for their technical or organisational expertise and may be asked to intervene on work sites or projects on an ad hoc basis. These experts or specialists' vision of safety may be very different from that of their client or project manager. Given the types of missions assigned to them, they can have a significant influence on decisions or on the mindset and work methods of the other stakeholders. With them, it is therefore crucial to insist on the importance of safety and of following the Golden Rules or the fundamental principles established by the client company or the project manager, when agreeing on the terms of their contract and throughout the execution of the work they were hired to perform.

Bridging document

Example

The client company and the external contractor company meet before the start of operations (projects, maintenance... depending on the type of contract) to examine the coherence between their respective Golden Rules.

Following this meeting, any similarities between the rules are described in what is often called a "bridging document", which also outlines any specific features of each. This document is appended to the contract and signed by the respective top management representatives to signify their mutual commitment to safety. All relevant parties are informed of its content.

8.1.2 Ensure the involvement of client company and external contractor company management is visible when implementing Golden Rules

Without a joint commitment from the chains of command of both the client company and the external contractor company on the subject of the Golden Rules, it is difficult to initiate any constructive, effective and long-term process.

First and foremost, this commitment on the part of the top management of both companies must be made very clear. It should be formalised using simple media that are accessible to all (poster, video, company newsletters, etc.), with coordinated dissemination.

Then, it must be instilled in the different echelons of management through concrete actions, as presented in this chapter. Each partner's chain of command must be visibly exemplary when it comes to:

- ▷ Applying their own Golden Rules;
- ▷ Showing an interest in and supporting the implementation of their partner's Golden Rules.

The credibility of their mutual commitments hinges on this.

8.1.3 Hold joint toolbox talks about the Golden Rules

While it is important to obtain a strong commitment from both partners on the subject of the Golden Rules from the start, the most crucial momentum will come from the sharp end.

Joint toolbox talks introduce symbolism and initiate direct dialogue between the stakeholders. They are underutilised tools that must be promoted. They offer a wonderful opportunity for dialogue enabling the two actors to share a common vision of the real conditions in which the Golden Rules are applied and of the difficulties encountered by one protagonist or the other. During these talks, participants should feel free to speak up about any breaches or rule bending they may have identified. It is crucial for everyone to ensure a climate of total transparency on the subject so that information that is key to safety may be discussed. Holding back information can be detrimental to everyone. There are certain obstacles that prevent external contractor company employees from speaking freely. If the contractual relationship is not clear on this point, it can be a major hindrance. Each company's chain of command must make every effort to ensure that this relationship does not prevent contractor employees from reporting any anomalies they notice, even when these relate to the logistics services provided by their client.

8.1.4 Manage safety tools (safety visits, event analysis) jointly

Deploying tools that are common to both client company and external contractor company teams is not always a widely accepted and established practice. Besides toolbox talks, other prevention tools can be used collaboratively. Managing tools such as safety visits and event analysis jointly can introduce a new way of approaching the matter and reinforce both parties' commitment to the process.

The topic of the Golden Rules can be a way to initiate this process and to jointly raise the importance of these rules at the sharp end, whether they are the external contractor company's or the client company's.

8.1.5 Teach employees to look out for one another's safety and promote the duty to speak up when a Golden Rule is broken, regardless of status

The first principle the company and its external contractors should focus on especially is that of ensuring that their employees feel completely confident to intervene when they witness a co-worker breaking a Golden Rule. It is often at this level that cooperation with respect to the Golden Rules is the most difficult to build, even though it is an important factor in preventing serious injuries and fatalities. Each company must make every effort to get their employees fully on board in this area.

For this, it is important to be very clear about what each of the partners is expected to contribute in order to move the site towards a strict application of the Golden Rules.

The quality of the working relationship between the client company and its external contractor at the sharp end must be a strong area of focus so that, gradually, the employees of both begin looking out for each other and ensuring compliance with the Golden Rules. All too often, contractor company employees are reluctant to challenge their client and, when they do, the reactions are not always appropriate. This is not easy on the client company's side either; discouragement factors can come into play, such as being "brushed off" by the external contractor company or getting the feeling of "talking to a brick wall".

The external contractor company and their client must jointly and regularly assess their employees' propensity to speak up and take effective action when rules are being broken.

8.1.6 Encourage people to report the situations in which the rules cannot be applied

Lessons are drawn from situations that were stopped in time, because the Golden Rule could not be applied and because of the way they were handled. These help to improve the technical system and the organisation, as well as increase overall resilience.

Contractors are experts at their jobs and the specific operations entrusted to them. As such, they are key to anticipating and detecting high-risk situations in which it is or it will be impossible to apply a Golden Rule due to their client's site configuration. To call attention to such situations, they too need to be given access to a quick and easy reporting system. Information must be communicated to them regularly by their direct superiors and by their client's chain of command, during joint toolbox talks for example. Contractors must be systematically trained in using this reporting system.

When faced with situations where a Golden Rule cannot be applied, the partners' teams must be able to come together to decide on how to handle the situation. Working in a coordinated manner, the partners can then communicate among themselves to swiftly inform the teams of the decision that has been reached and the actions they should take.

8.1.7 Introduce "initiative" type challenges to give positive reinforcement when the Golden Rules are being followed

The final lever available to companies is positive reinforcement: give recognition for the "most symbolic" efforts. Giving recognition, especially to external contractors, is essential to encourage appropriation of the Golden Rules. The company can, for example, organise "initiative" challenges that promote ideas for improving the implementation of the Golden Rules. These challenges can be rolled out to each team (client company and external contractor company) and/or better still, to mixed teams formed beforehand. These challenges are effective tools to increase motivation and create a hive mind for thinking about such issues.

Summary: synergy with external contractor companies

Key point

- ▷ It is often crucial to ensure that client and contractor company Golden Rules systems work in harmony, given how widespread outsourcing is and how significant the risks of serious injuries and fatalities are;
- ▷ There must be extensive dialogue between the client and the contractor company on this subject in order to show everyone that the two systems work in synergy;
- ▷ In practice, at the sharp end, every opportunity should be taken (joint toolbox talks involving client and contractor companies, joint site visits) to demonstrate and explain that all parties share the same vision and conviction when it comes to serious injury and fatality prevention;
- ▷ It is important to make it easy for workers to look out for one another's safety and report situations in which it is difficult to apply the Golden Rules. The system shared between the client company and the external contractor company must be able to provide speedy solutions;
- ▷ To encourage all workers to comply with the Golden Rules, positive reinforcement initiatives are powerful levers that the parties should not hesitate to implement together.

8.2 First-hand experience

How did you go about creating true synergy with the external contractor companies?

“ We’ve created a shared and pragmatic system that is mainly based on discussion. Together we tackle the concrete, daily problems encountered by workers at the sharp end:

The first tool is the “Sharp-end visit by the most senior local managers” during the planned annual refinery shutdown: the site supervisor and the regional manager (ECC), the site director and the shutdown manager (CC). For a period of 4 to 6 weeks, there are 2,000 people in a 1 km² area. This is planned over 2 years. It’s a major phase and safety is one of our top priorities! So we discuss it with sharp-end workers and contractors;

The second tool is what we call the “Safety contract owner”: a member of the executive committee is appointed as the ECC’s primary contact for safety-related matters. He/she is in charge of holding periodic (monthly) discussions with the ECC’s regional management, focusing exclusively on safety and without interfering in procurement or technical matters. Two people who can tell each other that a procedure, person or organisation isn’t working or is undermining prevention efforts, and decide on joint actions;

And the final tool is a “Joint audit of ECC and CC practices”: operational experts with a good knowledge of the sphere of activity attend the sharp end to evaluate practices. This can be done by a third-party contractor company with the guarantee that there will be no sanctions for anything observed as part of this evaluation. ”

What are the objectives?

“ To be visible and mobilised for safety. Managers must be consistent in their messages, “walk their talk”, focus on concrete issues and, above all, motivate workers. We need to prove, through organisations, that transparency is an asset. This is how we can really find out what our strengths and weaknesses are at the sharp end and take action together. ”

What problems or obstacles can be expected from this type of system?

“ Of course, everyone needs to be committed; it requires a certain rigour. There is also the matter of supervisory staff often being reluctant to call situations out and report information to their superiors. They fear isolation and of pro-management stigmatisation. Their work needs to be recognised and valued, but they should also be sanctioned for what is not acceptable and had been explained. ”

How do you ensure these synergies last?

“ As early on as possible, we must include common safety systems in contracts and analyse their results together! Next, we must address any deviations observed and find concrete solutions to any problems identified. Lastly, some degree of structure is required to measure progress but it is important to keep in mind that everything is based on discussion and communication. ”

Examples of Golden Rules: Controlling disruptive elements 2

(Actual examples from companies)

- ▷ Plant start-up and shutdown phase: all equipment and machinery must comply with established procedures.
- ▷ High-risk situation - facility start-up and shutdown.
- ▷ Report any anomalies.
- ▷ Report suboptimal conditions, increase vigilance.
- ▷ Keep plant work spaces properly maintained and tidy.
- ▷ Keep office spaces tidy and in good condition.
- ▷ Keep your work space clean and tidy.
- ▷ Keep your workplace clean and tidy.
- ▷ Never begin an operation if unprepared. Never improvise - Pre-job briefing mandatory.
- ▷ Maintenance work: safety measures resulting from a risk analysis must be strictly observed.

FIG. II.8.1 – *Examples of Golden Rules: Controlling disruptive elements 2 (lines of defence)*

Conclusion

The Golden Rules are unlike any others: their purpose is to save lives. Their analysis, as part of the work carried out by ICSI's "Serious Accident Prevention" discussion group, shows that they underpin several aspects of accident prevention. Among these aspects, those relating to human and organisational factors sometimes figure less prominently. They are less present in rule wording and in supporting actions. Latent factors or "disruptive elements" receive less consideration and attention than hazardous situations and the physical or organisational measures in place to reduce the risks associated with them.

They *appear* to apply more to sharp-end workers and their supervisors. But when their content is analysed in further detail, it becomes evident that they should involve all parts of the company much more broadly. Indeed, their long-term implementation affects all echelons of management when it comes to decision-making, and all support functions for the various areas concerned. The importance of involving all members of the company is not always taken into account in the change strategy and in the coalition that must support it in order for it to be a success.

Appropriation of the Golden Rules by sharp-end workers is more difficult than one might expect. This is one issue which, over time, can lead to the rules not being strictly followed.

In light of these findings, the discussion group examined the conditions for a successful implementation of Golden Rules. In this *Cahier*, the change management required to implement Golden Rules has been described through eight principles we consider critical. There is no absolute chronological link between these each of these; they are each important for ensuring that the process being undertaken is successful.

Choosing the Rules is in itself important for mobilising all stakeholders. Convincing everyone of the need for the Golden Rules and of how effectively they can prevent serious injuries and fatalities is also an essential prerequisite and few have achieved it. Finding project champions within a coalition composed of the vast majority of stakeholders (functional managers, employee representatives, etc.) is also crucial. They must be credible and convinced of the benefits of implementing the approach. They will need to support the process for the long term and through each of its stages. Taking into account the real obstacles to the implementation of the Golden Rules, and the necessary decisions and solutions are essential to ensuring its credibility.

True and deep embedding of the rules within the work groups through a strong mobilisation of all levels of management, and the introduction, if one is not already in place, of a just and fair culture policy are solid foundations which are essential for a lasting integration of the Golden Rules in the organisation.

Lastly, given the significant portion of a company's activities entrusted to external contractor companies and the corresponding high risk of accident, it is essential to ensure that there is synergy between both partners' Golden Rules or equivalent systems.

Taking action to implement Golden Rules is important, however it is but one aspect of a broad process, as reviewed and presented by the discussion group. That is why this *Cahier* is the first instalment in a series on the topic of "Serious Injury and Fatality Prevention", and others will follow. Of course, it reflects current thinking on the subject, arising from the meetings between the discussion group members. There will be a need to ensure in the future that the ways of conceiving and implementing the Golden Rules evolve. Operational experience feedback on this subject from a larger number of companies will be very useful to confirm these initial findings and enrich them with new information. It should reveal the progress made in serious injury and fatality prevention. A review every three to four years would be ideal in order to update the approach if necessary.

For the first *Cahier* in the series, we decided to focus on the Golden Rules approach. Many companies have already embarked on this undertaking and we were able to draw lessons from their experiences. This is a highly symbolic undertaking, as it makes very clear the determination to prevent the serious accidents which continue to occur despite all the measures taken previously. The Golden Rules are a kind of emblematic symbol. Choosing and implementing them requires a carefully considered and constructed approach that will contribute to instilling new ways of thinking and behaving to prevent serious injuries and fatalities.

In this respect, they must also be an important catalyst for the evolution of the company's safety culture. Ultimately, safety culture evolution is the only way to prevent serious injuries and fatalities effectively in the long term. Therefore, it is primarily the evolution of this culture that should be targeted and monitored via the implementation of Golden Rules, underlining their importance in the overall serious injury and fatality prevention system.

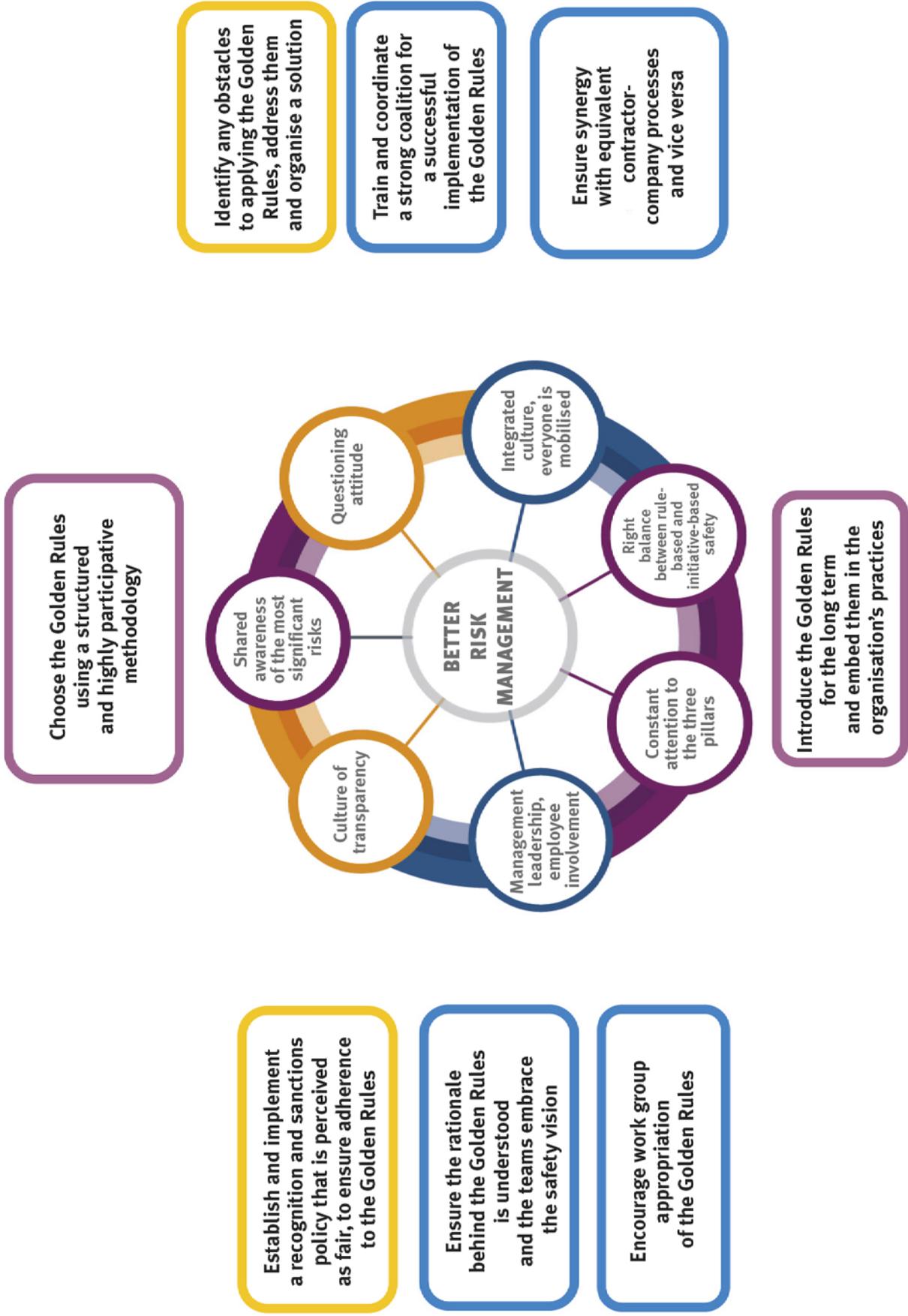


FIG III.1.1 – The Golden Rules – An important catalyst for the evolution of the safety culture:

The eight principles of the Golden Rules and the safety culture

Abbreviations

CC:	Client company
ECC:	External contractor company
PPE:	Personal protective equipment
HOFS:	Human and organisational factors of safety
HSE :	Health, safety and environment
HR:	Human resources
OH&S:	Occupational health & safety
SIF:	Serious injuries and fatalities
SIMOPS:	Simultaneous operations
SMS:	Safety management system

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