

Developing Global SHE Metrics to Meet Organizational and Regional Requirements

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Introduction

Organizations in all business sectors around the world use a variety of metrics both to measure safety, health and environmental (SHE) performance and to benchmark with other similar companies in order to determine their performance improvements or deterioration over a period of time, both internally and externally. SHE professionals are faced with critical decision making regarding the use of leading or lagging indicators to achieve the desired organizational results with respect to management's vision. Further, the introduction and use of financial metrics (e.g., the cost associated with work-related losses) will add additional value to creating a "Balance Scorecard" approach to SHE metrics. In this presentation the panel of global SHE experts will examine the various metric models in different regions of the world and discuss their compatibility and opportunities to standardize them for more consistency.

Achieving “World Class” SHE status is most often measured by the attainment of numeric metric goals expressed in lagging indicators. This presentation will discuss various additional methods used to express SHE successes around the world that will meet regional regulatory requirements and affect true and measurable change in any organization.

Understanding Lagging Indicators:

- Injury and Illness Data
- Fatalities
- Litigation
- Regulatory Intervention
- Property Losses
- Loss Data

Utilizing Leading Indicators:

- Employee Perceptions
- Active Safety Committees
- Rigorous Inspections
- Meaningful Inductions
- Risk Assessments
- Increased Training

Consideration of Financial Metrics:

- Metrics that Influence Organizational Financial Decisions
- Awareness of Cost Related Outcomes
- Using SHE Metrics to Impact the “Bottom Line”

Regional Regulatory Implications:

- Understanding the Health and Safety Executive Requirements.(UK)
- Understanding the Ministry of Manpower Requirements (Singapore).
- Understanding the Occupational Safety and Health Administration Requirements (USA).
- Other Regional Regulatory Requirements (Middle East Countries)

SHE Regulatory Framework and Relevant Performance Metrics in the United States

The Occupational Safety and Health Administration (OSHA)

In 2007, there were 4.2 million occupational injuries and illnesses among U.S. employees. Approximately 4.6 of every 100 employees experienced a job-related injury or illness, and in 2006, 5,703 employees lost their lives on the job. The leading cause of occupational-related fatalities was transportation-related accidents. These are staggering numbers even considering the size of the domestic workforce in the U.S.

As a result of the Occupational Safety and Health Act of 1970, employers in the United States are responsible for providing a safe and healthy workplace, free of recognized hazards, for their employees. The Act also created the Occupational Safety and Health Administration (OSHA) as the enforcement branch of the U.S. Department of Labor. OSHA's role has been to promote the safety and health of America's working men and women by setting and enforcing standards; providing training, outreach and education; establishing partnerships; and encouraging continual process improvement in workplace safety and health. For more information, visit www.osha.gov.

The OSHA safety and health alliances are part of OSHA's ongoing efforts to improve the health and safety of employees through cooperative partnerships with trade associations, labor organizations, employers and government agencies. OSHA currently has more than 470 alliances throughout the nation with organizations committed to fostering safety and health in the workplace. OSHA is also a leader in providing various safety and health outreach resources to companies in all business sectors. The OSHA Voluntary Protection Program (VPP) is a model for developing a management systems program to ensure regulatory compliance through maximizing management support and employee participation.

Calculating OSHA Rates

Proactively measuring safety performance is a hallmark of best-in-class companies. In an effort to maximize safety, such companies often strive to establish rigorous health and safety programs that yield a Total Case Incident Rate (TCIR) of <1.0, which OSHA mandated as the industry standard in 2002. A related metric regarding days away from work and/or related restricted time (DART) is calculated using a similar formula. Together, these two metrics are also the cornerstone of benchmarking with similar companies in a particular business sector or through trade associations.

The TCIR is calculated based on the injury/illness rate reported during a 200,000-employee-hour time period (the approximate number of hours worked by 100 employees during 50 weeks at 40 hours per week). The U.S. Bureau of Labor Statistics (BLS) uses TCIR in reporting occupational injury and illness statistics. TCIR data are developed from OSHA-required recordkeeping by industries and organizations following the system. As mentioned, attaining a TCIR of <1.0 requires a strong commitment to safety, the development of a comprehensive plan for each project, and the ability to execute to that plan.

The DART rate is calculated by adding up the number of incidents that had one or more Lost Days, one or more Restricted Days or that resulted in an employee transferring to a different job within the company, and multiplying that number by 200,000, then dividing that number by the number of employee labor hours at the company. In simple terms the "Number of DART Incidents" is the sum total of the days indicated on columns K and L of the OSHA log (Form 300). Accordingly, a DART rate is calculated as follows:

$$[(\text{Column K} + \text{Column L}) \times 200,000] \text{ divided by the number of employee labor hours.}$$

OSHA Site-Specific Targeting (SST)

Why is it important to know your company's DART rate? OSHA uses it to develop annually what is known as a Site-Specific Targeting plan (SST). The SST lays out what categories of companies OSHA considers high priority targets for safety and health inspections in a given year. It amounts to a veritable "Most Wanted" list for OSHA compliance officers.

The chance of a SST OSHA inspection for most organizations will depend on the frequency that their employees miss work, suffer work restrictions, or receive transfer assignments due to work injuries or illness. The source of this information comes primarily from OSHA's survey of employer's incidents of injury and illness for the most current year that data is available, which is usually two years prior to the SST plan year. Employers are required by law to complete the survey. OSHA may also target particular industries that have a historically high injury rate, suspected underreporting employers, companies with other OSHA reported incidents, and those that failed to respond to the survey.

OSHA recently announced its 2008 Site-Specific Targeting Plan. A careful reading of their SST plan will reveal that if your company is on their list you may be subject to a complete, detailed OSHA inspection of your entire operations. If you fall within the parameters of OSHA's SST plan it is strongly recommend that you quickly evaluate your safety program from an OSHA compliance perspective and prepare accordingly.

Leading Indicators

To achieve a culture that strives for a best-in-class safety performance, a company must create and execute a proactive safety plan for each manufacturing, engineering and installation project which emphasizes leading indicators over lagging indicators. This written plan must integrate procedures, instructions, discipline, communications, training, inspections, incident investigations, process reviews and recognition programs for each project. The goal of the plan should be to detail--in advance--every significant safety risk that could cause:

- * Injuries, Illnesses or Fatalities
- * Significant Environmental Excursions or Impacts
- * Regulatory Violations or Enforcement Actions
- * Major Asset, Product or Business Losses

Many multinational companies have initiated proactive programs over the past several years. The following is an example of one such company's initiating an eight-point safety program designed to keep workers safe and prevent equipment losses, production interruptions and environmental releases. The results include an average Total Case Incident Rate (TCIR) of 0.29 (OSHA mandates a TCIR rate of less than 1.0).

The process involved the following steps:

1. Project Safety Assessment
2. Data Gathering and Scope Definition
3. Defining the Safety Action Plan
4. Management Sign-Off
5. Kickoff and Training
6. Project Execution
7. Reward and Recognition
8. Project Review and Closeout (lessons learned)

SHE Regulatory Framework and Relevant Performance Metrics in the United Kingdom & Europe

The Health and Safety Executive (HSE) is a non-departmental public body in the United Kingdom. It is the body responsible for the encouragement, regulation and enforcement of workplace health, safety and welfare, and for research into occupational risks in England and Wales and Scotland. Responsibility in Northern Ireland lies with the Health and Safety Executive for Northern Ireland. The HSE was created by the Health and Safety at Work etc. Act 1974, and has since absorbed earlier regulatory bodies such as the Factory Inspectorate and the Railway Inspectorate though the Railway Inspectorate was transferred to the Office of Rail Regulation in April 2006. The HSE is sponsored by the Department for Work and Pensions. As part of its work HSE investigates industrial accidents, small and large, including major incidents such as the explosion and fire at Buncefield in 2005. Though it formerly reported to the Health and Safety Commission, on 1 April 2008, the two bodies merged.

The HSE (Executive's) duties are to:

- Assist and encourage persons concerned with matters relevant to the operation of the objectives of the HSWA;
- Make arrangements for and encourage research and publication, training and information in connection with its work;
- Make arrangements for securing that government departments, employers, employees, their respective representative organizations, and other persons are provided with an information and advisory service and are kept informed of, and adequately advised on, such matters;
- Propose regulations.

The Executive is further obliged to keep the Secretary of State informed of its plans and ensure alignment with the policies of the Secretary of State, giving effect to any directions given to it. The Secretary of State can give directions to the Executive. On 1 April 2006, the Executive ceased to have responsibility for railway safety. The Executive is responsible for the Employment Medical Advisory Service which operates as part of its Field Operations Directorate

HSE and Europe

The United Kingdom joined the European Economic Community (EEC) at the beginning of 1973, which became the European Union (EU) in 1992.

People across HSE work with various international bodies on occupational health and safety law (OSH). In the European Union these include the following:

- Directorates General of the Commission
- European Agency for Safety and Health at Work
- Eurostat
- European Committee for Standardization

Dedicated teams in HSE's policy, technical and operational divisions are responsible for negotiating and implementing specific Directives, Standards and Conventions, via domestic legislation. HSE's International Branch takes an overview of this work, with a wide range of responsibilities.

SHE Regulatory Framework and Relevant Performance Metrics in the Middle East

The following are insights into the Safety Health & Environment related legislative framework in the Middle East and relevant performance metrics. In addition, the paper also will review the practices and methods of major Oil & Gas companies in the Middle East Region used to evaluate their SHE performance.

Background

The petroleum industry is an essential element of the Middle East and it is of vital importance to the health and welfare of the region. A complete and thorough understanding and its implications on safety health and environmental aspects due to Oil & Gas industry operations is a major consideration by the regulatory policy makers. The Oil & Gas industry operations mainly consist of exploration, development, production of crude oil and its refining involving various operations including drilling, processing, and transport and refining. The risks associated at each stage of activity must be studied, evaluated and provide proper control measures to minimize the impact on the health of workers, to ensure safe working conditions and to protect the environment. In the last decade, all Middle East Countries have promulgated legislation on safety, health and environment protection and are in the process of mandating strict enforcement.

SHE Regulatory Framework in the Middle East

In the Kingdom of Saudi Arabia (KSA), the Presidency of Meteorology and Environment (PME), an agency of the Ministry of Defense, theoretically acts as the environmental watchdog and regulatory agency. Further, labor laws of the KSA are designed to focus on safety of workers from environmental and occupational hazards. Another authority in the KSA is the Royal Commission Environmental Regulations of September 1999. There is a provision in these laws to penalize, including imprisonment, for up to five years or temporary or permanent closure of the defaulting facility. All industries must report to the government agencies on a periodic basis on the man hours, accident reports, waste management issues and occupational health aspects to related agencies.

In the United Arab Emirates (UAE), the basic legislative frame work is Federal Law No. 24 of 1999 concerning the Protection and Development of Environment. Another Federal Law, No.8 under the labor code is in place for the protection of workers from unsafe workplace conditions as well as environmental and occupational hazards. The Federal Environmental Agency (FEA) is mainly responsible for protection of the environment. FEA has designed the Environmental Research and Wildlife Development Agency (ERWDA) in Abu Dhabi to handle daily environmental matters. The Dubai Municipality and specifically the Environmental Protection and Safety Section (EPSS) have this responsibility. Environmental regulations require industries to perform impact assessment studies for specified projects such as monitoring of land, air and water pollution, handling of hazardous substances and chemicals and liability and compensation. According to federal law, penalties for non-compliance include fines, imprisonment and even the death penalty in the case of radioactive materials and waste dumping. All industries must report to government agencies on a monthly basis on the man hours, accident reports, waste management issues and occupational health aspects.

The State of Kuwait enacted environment laws in 2000 and created the Environment Public Authority to foresee the implementation of these regulations. It consists of the Council of Ministers, which is responsible for protecting the nation's environment by developing policies, establishing guidelines, executing & supervising work plans, supporting environmental research, monitoring the environment and examining international and regional agreements. In addition, the Social Affairs Ministry provides the labor laws which cover and protect the worker safety and occupational health and work environment issues. All private sector companies must provide periodic results on man hours, accidents, and occupational illnesses reports to government agencies in Kuwait.

In State of Qatar, the Supreme Council has the overall responsibility for protecting the environment. It develops policies and procedures aimed at protecting the environment and effecting sustainable development, monitor the current environment and wildlife related protective procedures and practices, prepares the necessary drafts of legislation, regulations and divisions on the protection of environment. It also operates a national environmental data base alongside other environmental protection related functions. However protection of workers from occupational hazards is governed by labor laws and codes. As per these laws, all companies must provide periodic reports on man-hours, accident statistics, occupational injuries and illnesses etc.

Other Middle East countries such as Bahrain and Oman have Royal Decrees in place which provide framework for all other laws and regulations concerning environmental protection. Worker safety, protection from occupational injuries and illnesses is scrutinized under the labor code. In Oman, penalties for non-compliance include paying large fines. The appropriate authority may also issue compliance notices, with the ability to shut down the violating party until the breach is rectified and possibility of imprisonment.

Generally, SHE practices in the Middle East vary from industry to industry. However, the Oil & Gas Sector in the Middle East have well developed SHE policies and procedures and strict enforcement of regulations by the various country regulatory agencies.

SHE Metrics in the Middle East Oil & Gas Sector

As mentioned in the existing regulatory framework in the Middle East, it is very general in nature and applicable for all types of industries. There are no specific regulations for the Oil & Gas industry. As Oil & Gas industry operations are 'high risk' oriented, all major companies in the Middle East region have established their own SHE management systems either based on the international management consensus standards such as ISO 14001 and/or OHSAS 18001 series or the systems are customized by each company. The basic objective of a management system is to meet legal requirements, protect organization assets, provide safe working conditions, and protect environment. Another important and significant nature of Oil & Gas industry in the region is outsourcing of many operations. As these organizations have various internal and external customers, such as employees, visitors, contractors, regulators, the public and other relevant stakeholders. Therefore, this management system must ensure it monitors and controls the performance of both company and contractor operations. These systems use performance standards or metrics to evaluate the outcomes. Most of the Oil & Gas companies use the concept of Balanced Score Card approach in evaluating the performance with respect to SHE. These include financial, customer satisfaction and learning & growth potential. Every company in the region has established a mechanism to collect the key performance indicators (KPIs) include both leading and lagging indicators of the company's and contractors SHE performance on periodic basis. These KPIs are measured with respect to targeted figures and presented to the company management on monthly, quarterly and annual basis. The following are examples of the common lagging and leading KPIs used in the Middle East Oil & Gas industry:

A. Lagging Indicators:

- Industrial Disabling Injuries (IDI)
- Industrial Non-Disabling Injuries (INDI)
- Total Lost Workday Cases
- No. of Fatalities
- IDI Frequency Rates
- Severity Rates
- Number of Motor Vehicle Accidents (MVA)
- MVA Frequency Rates

- Number of Fires
- Number of Spills
- Number of Environmental Incidents and Violations
- Number of Asset/ Property Damages
- Number of times Effluent Discharges into the Sea above Regulatory Limits
- Volume of Spills

B. Leading Indicators:

- Number of Safety Meetings
- Number of Tool Box talks
- Training Man Hours
- Number of Inspections
- Number of Awareness Sessions
- Number of SHE Audits
- Number/type of Reward/Recognition Programs

In general, all Oil & Gas companies in the Middle East have established a mechanism to establish annual targets for these KPIs and monitor their progress on a frequent basis.

In conclusion, these SHE Metrics are helping Oil & Gas companies in the Middle East region to improve their performance and in providing a safer workplace, meeting legal requirements, ensuring stakeholder requirements, protecting the environment and other related benefits. Further, these metrics are reviewed on a continuous basis, similar to the international standards, to meet the global customer requirements in the process of globalization.

SHE Regulatory Framework and Relevant Performance Metrics in Asia Pacific

The following is a brief summary of various regulatory agencies throughout the Asia Pacific region which oversee workplace safety and health.

China

The Occupational injuries in China are classified from mild injury cases, to severe injury cases (needing to take leave more than 105 days leave) according to the severity of the injury and death cases. If the interval between injury and death is more than 30 days then it is classified as a severe injury case. It is stipulated that all the severe injury cases and the fatal cases must be reported to Labor Departments of both local district and industry, while the mild cases must be kept on file in the company.

It is also required that the responsible leader of a company notifies Labor Departments of both the local District and Bureau of Industry as well as local Labor Department within 24 hours after the occurrence of a fatal workplace injury. The fatal accident investigation reports were completed on site by Labor Departments of local district and the industry following this notification used to identify the cases.

National Safety Statistics (Jan to Dec 2008)

Severe and fatal occupational injuries (fatality \geq 10, direct loss \geq RMB 5 million)

National-wide: 86 cases; 1315 fatalities

Mine industry: 42 cases; 689 fatalities

Coal industry: 31 cases; 503 fatalities

Major severe and fatal occupational injuries (fatality \geq 50, direct loss \geq RMB 10 million)

National-wide: 10 cases; 622 fatalities.

Coal industry: 5 cases; 174 fatalities.

Metal and non-metal industry: 2 cases; 321 fatalities.

Construction industry: 0 cases.

Foundry industry: 0 cases.

Fire: 1 case; 44 fatalities.

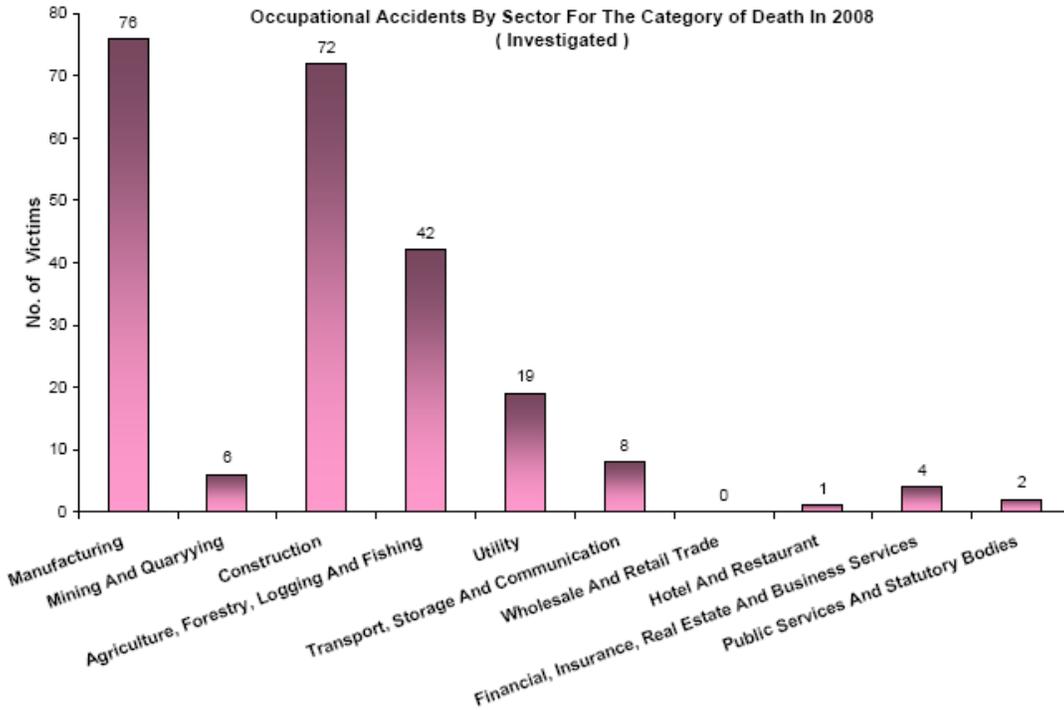
Road transport industry: 1 case, fatalities 51.

Railway transport industry: 1 case, 72 fatalities.

Malaysia

Occupational health and safety statistics are compiled by the Department of Occupational Safety and Health (DOSH), Malaysia on monthly as well as annual basis. National SHE metric presented is computed based on the number of victims that succumbed to workplace injury, those who suffer from permanent disability and non-permanent disability. Injury cases which meet the criteria stated under the Occupational Safety and Health (Notification of Accident, Dangerous Occurrence, Occupational Poisoning and Occupational Disease) Regulations are to be reported to the DOSH within seven days. The criteria are:

1. Fatalities
2. Injuries resulting in an employee absent from work for more than four days
3. Injuries resulting in immediate admittance to hospital and exceeding 24 hours

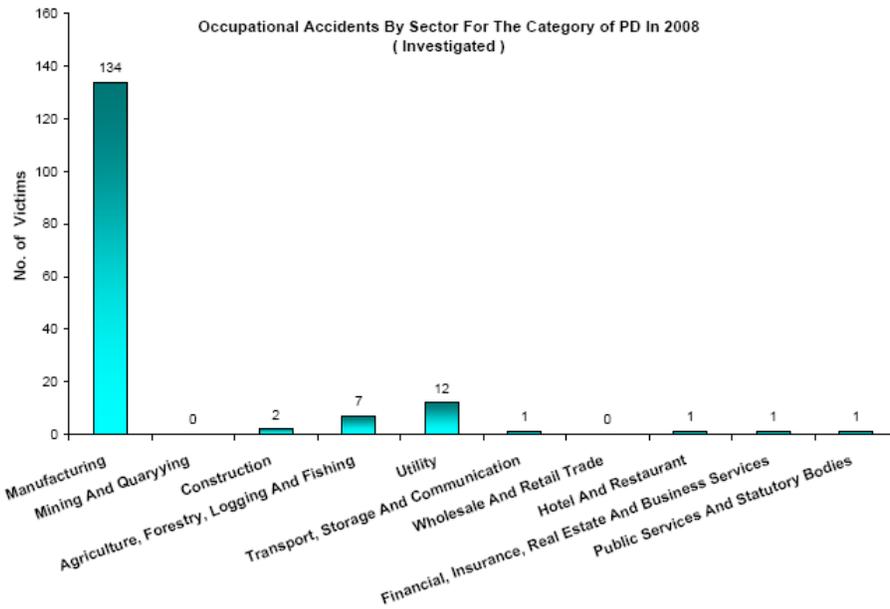


Graph 1: Occupational Accidents by Sector for The category of deaths in 2008.

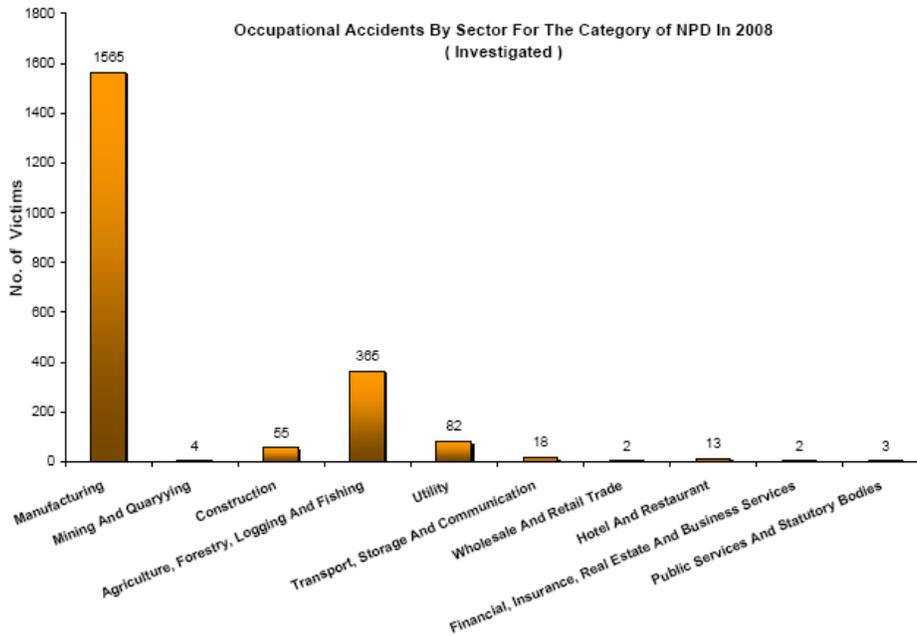
Note:

NPD: Non-Permanent Disability

PD: Permanent Disability



Graph 2: Occupational Accidents by Sector for The category of PD in 2008.



Graph 3: Occupational Accidents by Sector for The category of NPD in 2008.

Singapore

The Ministry of Manpower – Workplace Safety and Health

The Ministry of Manpower is the prevailing regulatory agency in Singapore regarding occupational safety and health. The Occupational Safety and Health (OSH) framework aims to cultivate good safety habits in all individuals, so as to create a strong safety culture at the workplace. The new framework is guided by the following principles:

- a) Reducing risks at the source by requiring all stakeholders to eliminate or minimize the risks they create
- b) Instilling greater ownership of safety and health outcomes within the industries
- c) Preventing accidents through higher penalties for compromises in safety management

The Workplace Safety and Health Act (WSHA) is the key legislation affecting the principles of the OSH framework.

The WSHA emphasizes the importance of managing Workplace Safety and Health (WSH) proactively, by requiring stakeholders to take reasonably practicable measures that ensure the safety and health of all individuals affected in the course of work.

The WSHA replaces the Factories Act. The key reforms under the WSHA include:

- a) Allowing for a gradual increase in scope to cover all workplaces
- b) Assigning responsibilities to a range of stakeholders at the workplace along lines of control
- c) Focusing more on WSH systems and outcomes
- d) Providing for more effective enforcement through the issuance of 'remedial orders'
- e) Providing for higher penalties for non-compliant and risk-taking behavior, to prevent accidents at the source

The unveiling of the Workplace Safety and Health (WSH) framework in March 2005 and the introduction of the WSH Act on 11 March 2006, marked a new phase of development for WSH in Singapore. Making the change more challenging was the setting of a 10-year target to reduce the existing rate of 5.0 in the workplace fatality to 2.5 per 100,000 employees by 2015.

In April 2008 during the launch of the *National WSH Campaign 2008*, Singapore Prime Minister Lee Hsien Loong mentioned that he is encouraged that the Ministry of Manpower's efforts are already beginning to show measurable results. In 2004, accidents in the workplace throughout Singapore resulted in the loss of 83 lives or a 4.9 fatality rate (FR) per 100,000 employees. Three years later in 2007, the fatality rate was down to 2.9. The original goal was to reduce that figure by half, or 2.5, in 2015. This was well on the way to achieving. Hence, to build on this

noticeable achievement, a more ambitious goal, to reduce the rate to 1.8 within a decade was set as the goal. Singapore aims not only for a good safety record as the more developed countries, but to also have one of the best workplace safety records in the world.

The computation of national annual fatality rates and frequency rates in Singapore is based on the number of industrial accident cases reported via an online system, also known as I-Report. Occupational health and safety for Singapore is under the care of Ministry of Manpower – Occupational Health and Safety Division. Incident cases reported via I-Report are cases which satisfy three criteria specified in the WSH (Incident Reporting) Regulations (i.e. (1) fatality; (2) injury resulting in more than 3 consecutive medical leave days; or (3) injury resulting in more than 24 hours of hospitalization). The fatality rate refers to the number of workplace fatalities (victim-based) per 100,000 persons employed in Singapore. Accident frequency rate refers to the number of workplace accidents (incident-based) per million man-hours worked. Workplace incidents include both fatal and non-fatal cases in which the latter one encompasses incidents which cause either permanently disabling or temporarily disabling effect on victims. Again, incident cases which cause temporarily disablement are those cases which satisfy the later two criteria stipulated under the local incident reporting regulations. From the definitions given, it is evident that cases which resulted in less than four consecutive medical leave days or hospitalization for less than 24 hours will not be accounted for. Furthermore, those who are involved in highway accidents while traveling to and from work, in spite of traveling on company provided transportation, will also be excluded.

Table 1 : Number of Workplace Injuries and Occupational Diseases, 2007 and 2008^P

	January – June		2007
	2008	2007	
Overall Workplace Injuries	5,236	4,896	10,018
Fatal	32	28	63
Permanent Disablement	61	71	163
Temporary Disablement	5,143	4,797	9,792
Occupational Diseases	290	187	602

2008 ^P: 2008 figures are preliminary

Table 2 : Workplace Injury Rate and Occupational Disease Incidence, 2007 and 2008^P

Per 100,000 Employed Persons

	As at end June		2007
	2008	2007	
Overall Workplace Injury Rate⁸	241	225	460
Fatal	1.5	1.3	2.9
Permanent Disablement	2.8	3.3	7.5
Temporary Disablement	236	220	450
Occupational Disease Incidence⁹	13.3	8.6	27.7

2008^P: 2008 figures are preliminary

⁸ Workplace Injury Rate = $\frac{\text{No. of Fatal and Non-Fatal Workplace Injuries}}{\text{No. of Employed Persons}} \times 100,000$

⁹ Occupational Disease Incidence = $\frac{\text{No. of Occupational Diseases (i.e. chronic confirmed cases)}}{\text{No. of Employed Persons}} \times 100,000$

¹⁰ Accident Frequency Rate (AFR) = $\frac{\text{No. of Workplace Accidents Reported}}{\text{No. of Man-hours worked}} \times 1,000,000$

Private organizations in Asia Pacific normally use the number of lost workdays to represent SHE performance. Utilization of leading performance indicator has not achieved its recognition that it deserves with the exception of a few multi-national organizations which have facilities worldwide including Asia Pacific. These companies are driving the use of leading SHE performance indicators including their Asia Pacific facilities. Leading performance indicators used include quantity and quality of area inspections conducted by the management, SHE training and behavior-based safety, among others.

Using a “balanced scorecard approach” comprising leading, lagging and financial metrics should be the backbone of any organization’s SHE metrics. While use of leading and lagging indicators helps to demonstrate the functioning of people, programs and processes, financial metrics give the ultimate answer that businesses often look for--the final results. Further, explaining in terms of technical performance and using pure incident injury rate data, regardless of how tactfully it is done, does not possess enough of the intensity needed to drive change. SHE professionals should remember to communicate in term of business and financial metrics as well. Examples include percentage impact on unit cost and return on investment (ROI).

Additional information:

China Accident Statistic: <http://www.chinasafety.gov.cn/newpage/Contents.htm>

Malaysia Accident Statistic: <http://www.dosh.gov.my/wps/portal.htm>

Singapore Accident Statistic: <http://app.wshc.gov.sg/cms/Portals/0/WSHC.htm>

Conclusion

SHE professionals around the world must better position themselves to demonstrate a variety of both technical and non-technical skills everyday in the workplace in addition to technical SHE competency. These include helping to drive organizational performance, supporting continuous improvement, tracking demonstrated progress, and making a “business case” for their role. This can best be accomplished through the use of a “Balanced Scorecard” (e.g. leading, lagging and financial metrics) approach to SHE management to better align their activities with the organizational culture, and meet all applicable regulatory requirements. By doing so, they will become a valued stakeholder and create more opportunities to better influence organizational performance and play larger role in both short and long-term overall organization planning.