

## **The Twenty Foot Rule and Safety Leadership**

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### **Introduction**

“The Twenty Foot Rule: People within twenty feet of the problem will give you the best solution if you give them the opportunity.”

While almost every organization espouses the maxim, “Our employees are our most valuable assets,” few maximize the contributions of which employees are capable, due to internal communication barriers limiting their opportunities to contribute.

I was introduced to “The Twenty Foot Rule” at a medium-sized manufacturing plant about 20 years ago. After spending a day teaching employee teams basic principles of ergonomics for two days, we turned them loose to apply their new knowledge to address various ergonomic exposures. They went to work identifying ergonomic risk factors through basic incident analysis, conducting symptom surveys with their peers, and workplace observations. They then developed recommendations to reduce risk through engineering, improved work practices (they even developed their own peer observation process for the work practices), and administrative controls.

Two days later, when they presented their results, I was flabbergasted. As an ergonomist, I was humbled at how well they had come up with practical and cost-effective solutions. When I told the plant manager how impressed I was with the work his people had done, he shared with me “The Twenty Foot Rule.” Over the years I have come across a number of organizations that practice “The Twenty Foot Rule” with incredible results.

While this rule sounds simple, in reality it is easier said than done. This paper will address a number of process-driven activities that allow organizations to improve employee communications and increase their participation in the success of an organization. The paper will also discuss some of the barriers encountered over the years and strategies to overcome them.

### **The Open Door Policy**

While almost every organization has an “Open Door Policy” in which employees are encouraged to bring any issues to leadership, very few of these are very effective. The reason is quite simple. Almost every “Open Door Policy” requires the employee to proactively leave their workplace (where the issue likely exist in the first place), go to “the boss’ office” (quite intimidating) and

then explain the issue to the boss. Add to that the fear of negative repercussions from peers or even their supervisor (supervisors often see employees going to the boss as going over their heads). These barriers greatly restrict the effectiveness of the traditional approach. In addition, the policy as it exists is not very conducive to the application of a performance standard or metrics to measure it.

Businesses practicing “The Twenty Foot Rule” frequently adopt a “Reverse Open Door Policy,” requiring the leaders to go out into the workplace and practice Frank Bird, Jr.’s (1996) leadership principle:

“The Principle of Point of Action: Management efforts are most effective when they focus at the point where the work is actually done.”

While this practice is common at smaller, owner-operator sites, managers at larger operations frequently are bogged down in “the paperwork” of managing the business. It is not uncommon to find managers going months between meaningful trips to the shop floor.

Several benefits are achieved through the “Reverse Open Door Policy:”

- The leaders are proactive in soliciting input from the workforce.
- Employees are more comfortable “on their turf.”
- Actual issues can be seen as opposed to described, reducing miscommunications.
- visible leadership in the workplace is supported.
- The leader’s activities are conducive to performance standard development.

There are a number of common measurable activities available to apply this principle. One common example popularized a number of years ago is called Management By Walking Around (MBWA). While MBWA gets management out of the office and into the workplace, it is important to have established objectives and goals for this process. Several systems-based activities will support this process.

One weakness frequently encountered in the MBWA process identified in employee surveys and interviews is that unless the leader specifically brings up health and safety, the employees do not see the “management tour” as related to the safety process.

In order to address this it is recommended that the Health and Safety Department provide frequent updates to leaders on current health and safety issues. By providing specific talking points to leadership in preparation for site visits, it makes it easier for them to engage workers on health and safety issues.

#### Management Participation in Workplace Inspections

Senior management participation in workplace inspections can be a high-profile activity, demonstrating the Principle of Leadership Example (Bird, Jr.) while actively participating on the shop floor. When leaders participate in inspection activities, it is crucial they be prepared to actively participate and engage the workers, encouraging open and frank discussion.

While it would be easy to suggest managers simply ask employees if they have any safety issues to discuss, this often proves ineffective. In interviews and observations of leaders

participating in inspections and workplace tours, several specific activities were identified that help stimulate discussion as well as provide reinforcement for safe work practices.

### Planned Personal Contacts

Planned personal contacts are usually performed by supervisors to make personal contact with each employee a minimum number of times within a specified time period. While this process usually focuses on the supervisory role, it can easily be extended to include other leaders. The leader should have a specific objective in mind prior to the contact. Topics may include:

- A discussion of the standard operating procedures (SOPs) and opportunities to improve them by asking employees to “teach” you how to do a task.
- Pre-task hazard assessments. Ask employees to review their pre-task hazard assessment (PTHA) that they had conducted prior to performing the task. This is particularly useful in the mining industry where most companies have implemented PTHAs. This technique can be used one on one and is especially effective with small groups or work teams.
- A specific discussion on a new or altered piece of equipment or process.

These discussions promote better integration of production and safety into a single discussion.

The contact should be recorded and the activity integrated into the manager’s performance reviews.

A critical element of these discussions is encouraging the worker to do most of the talking. This can be difficult for many managers who are used to giving direction. Training is suggested. When leaders turn the contact into a lecture, it frequently has a negative overall effect.

The standard needs to be well constructed to avoid “pencil whipping or a compliance approach.” At several organizations with this practice, managers would do almost all of their PPCs the week before their performance review. Employees, aware of this “rush to meet the KPI” saw this not as a sincere leadership activity but a “bonus protection activity,” resulting in loss of credibility, the opposite of the intended practice.

Planned personal contacts should always include the opportunity for the employee to bring up issues they might not otherwise report through the chain of command or the traditional Open Door Policy.

### Behavioral Observations as Planned Personal Contacts

Behavioral observations are an excellent opportunity for a planned personal contact. In organizations with behavioral observation processes, leaders asking employees to let the manager join in an observation is a strong reinforcer for the process. **Caution: Leaders need basic training on the behavioral observation process prior to participation. Numerous “horror stories” have emerged from leaders observing substandard behaviors, instigating disciplinary action, unaware of the “amnesty” commonly provided during peer observations.**

### Recommended Best Practice Integrating Behavioral Observations and PTHAs

Many managers and employees struggle with the artificial nature of the conversation at the end of behavioral observations. “It feels like a lecture” is a frequent comment from observers and

observees. In what this author considers a best practice, a mining operation in Argentina had used a review of the PTHA to start off the post-observation discussion. In witnessing this process, the observee frequently identified the substandard actions themselves while reviewing the PTHA. The discussions were seen as less stressful and more productive and provided strong reinforcement for the PTHA and behavioral observation process. This technique also facilitates leaders listening more and reinforcing that lecturing.

In the training video, “The Sid Story” (various distributors can be found on the Internet), the supervisor describes an excellent philosophy on planned personal contacts. “Every day I pick one thing to catch my workers doing something right, and if they aren’t doing it, they never knew I was looking.” He would then provide coaching when necessary, but the key point is to try and find something positive to reinforce and coach for improvement when necessary.

#### Caution: Leaders Solving Outstanding Problems During Inspections

In public and private courses this issue frequently arises. The scenario is as follows: The President, Vice President, etc. is touring the facility or participating in an inspection. An employee shows the leader the problem, and the leader agrees the problem needs to be fixed and tells local management to get it fixed. The problem gets corrected immediately, the leader looks good, and the employees are happy.

Local management is not happy. Often, the hazard had already been recorded and was in the process of being corrected. In some cases, attendees at classes have reported frustration that the same leader who ordered immediate action during the survey had the maintenance or capital request on their desk already awaiting approval. (While this is anecdotal, it is a common example, illustrating frustration from site managers and supervisors.)

While well meaning, this undermines the local inspection and maintenance processes. In auditing hazard reporting processes, it is not uncommon to discover employees had stopped reporting hazards through the system when they perceive they get better results by “telling the boss.” With the advent of e-mail, employees at some locations have begun reporting the majority of hazards to the boss.

It is recommended that leaders, when confronted with this situation, conduct the following procedure:

1. First, ask the employee if they have already reported it to their supervisor or through the appropriate reporting system. (It is not uncommon for the employee to respond “No, the system takes too long,” or something similar.)
2. Bring in the supervisor to discuss the issue and request they follow up on the status of the reported hazard and communicate back with the employee, including the anticipated resolution. If this information is not readily available, there is likely a deficiency in the system.
3. Leave the door open for further discussion if the situation is not resolved in a timely manner. (The leader usually does not need to be informed if the situation is resolved within standards. This is a delegated activity.)

The key to this process is for the leader to support the process and not bypass it. This not only reinforces the system but also avoids unknowingly undermining local management.

## **The Suggestion Box**

Another common tool used to encourage employee communications is the suggestion box. The suggestion box is usually placed in lunchrooms, near time clocks, in dressing rooms or in other common areas. In the past these were physical boxes with a slot on the top, a lock to maintain privacy, and forms for employees to submit ideas, report hazards and in some cases, make compliments for co-workers, supervisors or management. In many companies, the box in the lunchroom has been replaced by an inbox on a computer. The concepts remain the same.

It is critical that clear performance standards be developed for this communication process. A person, by name or title, must be assigned responsibility for collecting, reviewing, and distributing the information to the appropriate department to close out the suggestion. Specific timelines should be established for close outs and/or communication back to the employee on the status of the suggestion. For anonymous suggestions, some organizations post them on a bulletin board to show the status of open and closed-out items. This also allows communicating to the workforce when no action is to be taken and why. In confidential interviews, employees frequently indicate a strong preference to being told when no action will be taken versus no feedback, which is perceived as being ignored or a lack of concern on the part of management.

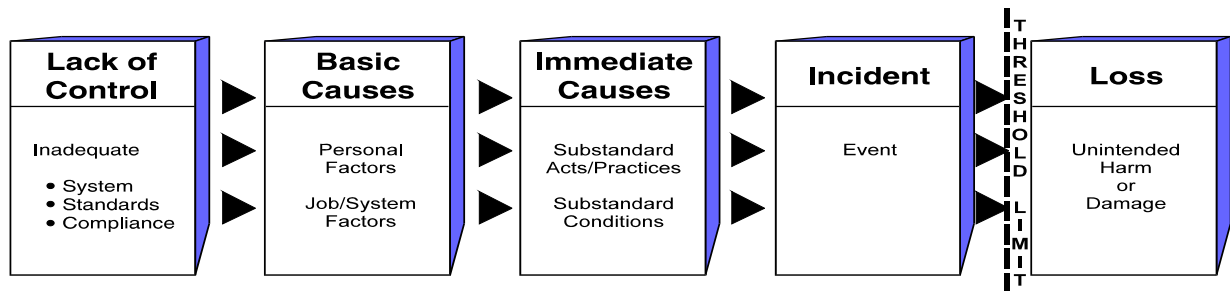
While the above considerations seem obvious, during audits, suggestion form dates frequently provide evidence that the boxes are not checked. In one extreme example, it took two days to find the key to the box (the person that had the key had forgotten they had it). Once opened two suggestions, one five months' old and the other and seven months' old, were found, along with orange and banana peels, bread crusts, and other mold-covered garbage. When this was shown to the plant manager, the response was to the garbage, "See, that's the type of employees suggestions we get, garbage." There was no acknowledgement of the seven-month old suggestion or the fact the box had been left unattended long enough for mold to grow. At the time, a financial analysis showed that the site had to run 14 months to produce and sell enough to produce enough profit to pay for 12 months' of workers' compensation claims. After improving communications and providing employees the opportunity to actively address problems, workers' compensation claims were cut by more than 50% in the first year alone.

Suggestion boxes are very effective communication tools, when appropriate management system standards are developed and complied with, supporting open communications and timely responses.

## **Incident Investigations: Sustainable Improvement Through Basic (Root) Cause Analysis**

For the purpose of this paper, the following information on incident investigations is included (Bird Jr., 1996).

Employee input into the incident investigation process is invaluable in identifying real workplace issues. Many employees have a natural tendency to look beyond the immediate causes (symptoms) of incidents and focus on basic causes, personal factors and job system factors (see Figure 1):



**Figure 1. Basic Root Cause Analysis** (Source: Bird, Jr., et al, Copyright: 1996, Det Norske Veritas (USA))

To effectively tap into the workforce in the investigation process, training and education needs to be conducted at all levels of the organization to provide a clear understanding of the difference between immediate causes and basic causes. Once the training is completed, employees should be included in the incident investigation process. It is critical that senior management understands the importance of remedial action based upon basic causes. While less frequent, there are still organizations in which incident investigations focus on “the employee’s behavior.” There are still consultants that promote the idea that the root cause of most incidents is employee behaviors. Organizations that subscribe to this frequently suffer from reoccurring incidents, low employee morale, and regulatory citations.

In short, immediate causes identify symptoms of deeper problems within an organization. Corrective actions for immediate causes usually include retraining or disciplining individual employees, cleaning up a spill, or putting a guard back on a machine. Remedial actions based upon basic causes allow system improvements, which reduce reoccurrence of incidents which supports continual improvement.

## Right Actions, Right Results, Right Rewards

### Case Study

“Right Actions, Right Results, Right Rewards” was the title of the employee recognition/incentive program at an organization that utilized “The Twenty Foot Rule” to not only to encourage employees to actively participate in health and safety but make them business partners in the process.

The strategy was to identify right actions, right results, and right rewards to encourage employee participation in turning around health and safety performance at one of the poorest performers in the industry.

NOTE: All leading and lagging indicators were tied to the employee incentive and management bonus KPIs. Employees’ incentives were tied 2/3 to right actions (leading) and 1/3 to right results (lagging). The higher up in management, the greater the weighting was toward right results. (The corporate Health & Safety Manager was 90% results-based.)

**Table 1. Right Actions Right Results, Right Rewards**

Baseline Metrics	Strategic Action	Result after 2 years
OSHA Lost Time 14 +	No specific action. Lagging indicator is what it is. YTD graphs provided to all sites showing District/Site and Corporate Rates.	< 3.5 (Validated)
WC, Auto, Liability Claims > \$2.8 million	YTD graphs provided to all sites showing District/Site and Corporate Rates.	< \$800,000 As determined by Paid & Reserved Losses
<ul style="list-style-type: none"> <li>• Active OSHA Citations</li> <li>• 5 sites, new and repeat citations</li> <li>• Legal litigation</li> <li>• OSHA considered sites “bad actors”</li> <li>• Frequent employee calls to OSHA</li> </ul>	<ul style="list-style-type: none"> <li>• <b>Remove attorneys from visible involvement</b></li> <li>• <b>Informal conference objectives set. Explain corrective actions for accepted citations, do not admit fault, dispute questionable citations</b></li> <li>• <b>Discuss OSHA Consultation resource. Explain plan for continuous improvement in management systems</b></li> <li>• <b>Improved communication with employees on issues and resolution</b></li> </ul>	<ul style="list-style-type: none"> <li>• <b>Legal fees reduced 90%</b></li> <li>• <b>Original citations settled for less than attorney projections</b></li> <li>• <b>Reduced inspection activity. OSHA began calling after employee complaints vs. showing up at the site.</b></li> <li>• <b>4 sites utilized OSHA consultation process</b></li> <li>• <b>Employee complaints became rare</b></li> </ul>
<ul style="list-style-type: none"> <li>• Employee regulatory required training completed</li> <li>• &lt; 60%</li> </ul>	<ul style="list-style-type: none"> <li>• <b>Established database to track training activities</b></li> <li>• <b>Standard set tied to employee incentive and management bonus of minimum of 90% in completion year 1, 95% in year 2</b></li> <li>• Audits conducted to validate completion. Employee interviews and workplace observations to measure effectiveness</li> <li>• Behavioral observations by employees</li> </ul>	<ul style="list-style-type: none"> <li>• <b>Training targets met each year. Several sites achieved 100%</b></li> <li>• <b>Employee surveys indicated higher quality training and improved morale.</b></li> <li>• <b>Workplace observations and behavioral observations (some sights) quantified reduced substandard acts and substandard conditions.</b></li> </ul>
<p><b>Several additional metrics were developed. Primarily based upon leading indicators for meeting attendance/participation, hazard reporting, and participating in investigations.</b></p>		

Several examples of employee engagement occurred involving liability claims. In one case, following an incident in which a backhoe struck a water line at a hazard waste cleanup site, the

employees conducted their own investigation, discovering a landscaping company had moved the flags while cutting the grass and did not replace them. This information was passed on the insurance company, which then subrogated against the landscaping company, thus saving the company over \$35,000. The employees then qualified for their end-of-year loss reduction target. The cost was \$4500, a great return on investment.

## **Conclusion**

Implementing the “Twenty Foot Rule” in a workplace requires a high level of integrity and trust, starting with leadership having faith in the value of their workforce. The more transparency there is in communications through clear standards, performance, and rewards, the greater the return on investment. The author has run into a many managers over the years than indicate skepticism of the process working. I refer them to a book called *Open Book Management: The Coming Business Revolution*, by John Case. (The author has no affiliation with Mr. Case or Harper Collins). I invite them to read the book and then ask themselves one question: Do I want to compete against a company like that!

The more an employer engages the workforce, educates them and brings them in as business partners, the greater their success in production, quality, sales, and last but not least, protecting people, property and the environment.

## **Bibliography**

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