Personal Protective Equipment

Q&A: John Dony, NSC, on OSHA Top 10 and Safety Culture

Gillian Scott and Don Sears | Oct 30, 2018

OSHA announced the 2018 list of most frequently cited violations at the National Safety Council Congress & Expo in Houston on Oct. 23. We talked to John A. Dony, director of both the Campbell Institute and environmental health, safety and sustainability at the National Safety Council (NSC), about how this Top 10 list improves workplace safety, the role of hazard assessments, and how facilities can create a "culture of safety."

John Dony

Every year the Occupational Safety and Health Administration's *Top 10 list* highlights the most frequently cited violations from the year before. From fall protection to machine guarding, many of the same violations appear year after year, suggesting that not much changes. Does the list have an impact on workplace safety? How can safety professionals use it to improve safety in their own facilities? And how can manufacturing facilities work with OSHA to avoid similar violations?

In addition to developing research and overseeing event, partnership and outreach initiatives, *Dony* guides the Campbell Institute's vision and strategy. At the *National Safety Council*, he is responsible for developing the council's environmental health, safety and sustainability management system and for helping to shape NSC EHS&S-related workplace strategy, vision and messaging. Dony is also a frequent speaker on environmental health and safety topics.

How would you describe the relationship between the National Safety Council and OSHA? How do you work together?

DONY: The National Safety Council and OSHA have had a long partnership that involves many different activities and initiatives. Most prominently, NSC works with OSHA staff on information and knowledge

transfer programs such as the *Safe + Sound campaign*, an ongoing initiative to promote a variety of occupational safety topics and good practice information. Through our government affairs group, we also comment and offer input on proposed OSHA regulation as well as advocate for funding for OSHA during federal budgeting season. From time to time, OSHA will ask NSC subject matter experts for direct input or advice on particular topics, such as the role of safety in sustainability, emerging technology, and safety management systems.

The 2018 OSHA Top 10 List

Here is the full list of OSHA violations by count and their respective rankings:

1.   Fall Protection – General Requirements (1926.501): 7,270 violations

2.   Hazard Communication (1910.1200): 4,552 violations

3.   Scaffolding (1926.451): 3,336 violations

4.   Respiratory Protection (1910.134): 3,118 violations

5.   Lockout/Tagout (1910.147): 2,944 violations

6.   Ladders (1926.1053): 2,812 violations

7.   Powered Industrial Trucks (1910.178): 2,294 violations

8.   Fall Protection – Training Requirements (1926.503): 1,982 violations

9.   Machine Guarding (1910.212): 1,972 violations

10.   Eye and Face Protection (1926.102): 1,536 violations

What is the significance and impact of the annual OSHA Top 10 list for safety professionals and worker safety overall?

DONY: The OSHA Top 10 list provides safety professionals with a snapshot in time of both what OSHA is seeing in the field as well as what its enforcement officers are paying the most attention to. Most significantly, it's highly relevant for identifying trends and areas of emerging risk across industry because it cuts across organizations of all sizes and types. While your individual organization or facility may not have the same risk profile as all of industry, the Top 10 still provides a timely reminder of some of the biggest challenges facing the safety profession and gives safety professionals grounded data from which to problem solve or make requests for resourcing.

Need help managing the challenges outlined in the OSHA Top 10 list? Read "Top Tips for Managing OSHA's Top 10 Violations."

How should manufacturing and other industrial workers and safety professionals interpret

and make use of the list in their daily work experience?

DONY: As I mentioned above, the Top 10 list isn't necessarily a tool for tackling your particular organization's risks and challenges. From a tactical perspective, though, it can help you understand what OSHA will be looking for if they come on-site, as well as check against any gaps you might have in compliance. Finally, the Top 10 list can provide you with the backing and data you need to make an argument for more resourcing or attention to a particular issue that is a challenge for you. For instance, if falls from heights are part of your risk profile, the Top 10 can help you make the case that your organization should invest more heavily in fall protection solutions, training or other resources, as well as allow for you to drive a cultural conversation with your team and leadership.

There had been an uptick in preventable fatalities from falls in the workplace from 2011 to 2016 (the last BLS data available). Where are we today with falls at work?

DONY: Falls are the third-leading cause of death in the workplace after motor vehicle crashes and violence, and falls from heights in particular were responsible for almost 700 fatalities in 2016, all of them entirely preventable. Today, the issue is by and large a cultural one–given that the technologies and approaches to saving lives in this arena are well-known or continuing to improve (for example, Bluetooth-enabled *fall protection* harnesses that prevent equipment from being raised to heights when not tied off). Preventing fall-related deaths therefore continues to be more about influencing and building a culture of safety in an organization and ensuring that workers understand and have access to the tools they need to be safe.

Is OSHA's increased emphasis on fall protection and fall protection training over the last several years making an impact? Please explain the evolution of training and how it has taken a bigger compliance role.

DONY: This is an area where NSC does not have great visibility—I would suggest that OSHA would know more about the efficacy of their efforts than we would. However, I can say that nowadays many organizations are focusing more on the effectiveness of fall prevention and many other types of training, whereas in years past the mentality around training has been much more check-the-box in nature. This change has come in tandem with new technologies on the training side such as adaptive learning, AR and VR training, and more. Organizations are coming to realize that effective training must address all learning styles and be memorable and resonant with individual learners. While from a *compliance* perspective very few of these elements are mandatory in nature, good organizations are moving the bar on training and learning across industry.

Do you believe that other manufacturing-centric areas of safety that regularly make the OSHA Top 10 list (such as hazard communication, lockout/tagout, respirators and machine guarding), will begin to see training compliance move on to the list?

DONY: This is not something I am really able to offer an opinion on directly, as this is much more up to OSHA than an organization like NSC. However, I will say that the above discussion around the evolution of training is relevant for all areas of safety, including haz com, confined space entry and rescue, *LOTO*, and *machine guarding*. Additionally, advances in the sorts of technology now leveraged for training (such as VR) and in other areas of operations/manufacturing (such as additive manufacturing) are transforming these risk areas. For instance, VR can not only be used for training, but for prevention through design work before changing or starting up a manufacturing process. Additive manufacturing can be used to manufacture safer tooling and even create machine guards on the spot.

See this visual snapshot of the haz com standard in the infographic: "The Evolution of the Hazard Communication Standard."

Does anything on this year's OSHA Top 10 list stand out to you as being unique or a major shift from past years?

DONY: There haven't been many major shifts except for the bottom of the list—which has changed year to year (wiring-related in 2017, *eye and face protection* in 2018). You had another question in a follow-up about how significant this is. I think that violations that are near the bottom of the Top 10 list tend to have more variability year over year and don't necessarily indicate a major shift or indicate that there has been a huge amount of increased risk in this area, as these may have changed based on the industry profile of OSHA inspections that were completed year to year. However, some macro trends may be influencing the change that are worth paying attention to—for instance, with an uptick in construction and building activity over the past few years has come a shortage in skilled labor that may be driving both newer and older workers into jobs where they don't well understand the risks posed on a jobsite. Temp and contractor work can create similar challenges. Given that eye and face protection are often associated with the sorts of activities on the uptick, there may well be a connection.

What is the role of safety and hazard assessments today? How has that evolved over the past decade?

DONY: Safety and hazard assessments continue to be the bedrock of safety activity today, but I think that the evolution has been from a compliance-oriented discussion to a more risk-based discussion. Safety and hazard assessments based solely on compliance are likely to miss a significant amount of potential risk. As safety professionals continue to learn more about the importance of identifying potential risk and precursors of significant injuries and fatalities, assessments have become much more nuanced and mature. This mirrors the regulatory framework that exists in places like the United Kingdom and Europe, which are far less prescriptive and focus on risk reduction versus compliance to a particular set of standards.

What does it mean to have a "culture of safety"? You see this term used a lot, but what does it mean to really have one? What metrics and other indicators can be implemented to help move a company toward becoming a safety culture?

DONY: *Culture* may sound "fuzzy," but it is absolutely measurable. Tools such as employee perception surveys are ways to get at the actual culture of an organization as it relates to occupational safety and health. The metrics derived from these sorts of activities are only half of the puzzle, though—the other half is addressing the feedback and input you get from these tools. Action planning and communicating on the steps taken and improvements made are just as important as asking for input and fixing the problem. Often, this sort of work is paired with an effort to move away from "lagging" indicators of performance (recordables, fatalities) to "leading" indicators of performance (quality of reporting, timeliness of corrective actions, etc.). I know that these are not explicit definitions of a safety culture, but are ways to measure and test the culture that already exists in your organization and move it forward. At the end of the day, though, culture is the way people do things when no one is watching—whether that's around safety or other aspects of the work.

What is your advice to best engage with OSHA to resolve infractions and citations for compliance violations?

DONY: Working to resolve the root cause of compliance violations is always the best policy—no matter what the citation is around, there is almost certainly a systemic cause or set of causes that can be addressed to avoid future compliance violations and reduce risk. It is key to remember, even in the face of a compliance violation or citation that you may not agree with, the goal of everyone in the safety profession (regulator and practitioner) is to prevent injuries and save lives. In the end, the ways we try to do this may differ, but we should always be looking for solutions that aim to prevent an incident or potential incident from occurring in the future.

How does your shop or plant use the OSHA Top 10 list to help your safety program?

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