

Are Cardinal Rules for the Birds?

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Over the past several years, virtually every major client of ours has adopted a set of cardinal rules for safety. There are several different names for these sets of rules, but they basically are held as more important than other rules. The thinking behind this trend is based on a belief these particular rules can prevent accidents of a higher potential severity than can be prevented by other rules.

There is not enough evidence to either support or challenge this assumption as yet, but there are some potential problems with both the logic of cardinal rules and the ways in which they have been implemented in some organizations.

One potential problem is some organizations simply copied someone else's list of rules. While there definitely is some universality in risks, especially within similar industries, there also are some significant differences. We have performed Pareto analysis of accident data from more than 1,600 sites and seldom find any two sites have exactly the same set of critical risks. We even have found significant differences between similar sites in the same company.

This means the list of cardinal rules may not accurately reflect the most important precautions to prevent the most likely severe accidents. Such misdirection can focus safety efforts and attention on items that are not highly important and miss others that are.

Unfortunately, the reason some organizations implemented cardinal rules is a problem in and of itself. Some industries have a few leading companies who tend to set the tone for safety and blaze the paths others try to follow. When some of these leading companies began to adopt cardinal rules, others followed, often for the wrong reasons. Some simply wanted to be a member of the club and do what the others were doing so they seemed more acceptable as partners to the leaders. Others were suppliers and contractors to the leading companies and were pressured to follow their safety programs in order to do business with them.

In companies that adopted these rules for reasons other than to improve safety, their hearts are not in the efforts and the rules are often not a good fit with other safety efforts. The whole attempt is awkward and artificial, and workers sense they are playing a

game that has little to do with safety. These cardinal rule programs produce little or no improvement and often create some bad side effects.

Cardinal Rules vs. All Other Rules

Another issue is, in some cases, the emphasis on cardinal rules diminishes the attention paid to the other safety rules. If these rules are the most important, it logically follows the other rules are of lesser importance and therefore don't deserve the same attention or compliance.

This attempt to focus workers' safety efforts almost is the opposite of what happened in recent major disasters. In the cases of several recent disasters, organizations had focused on the most common types of accidents and driven down their recordable rates. The problem was the attention to the minor accidents reduced the attention to more severe potential incidents and allowed them to happen.

With cardinal rules, the attention is focused on the most severe potential. If this actually detracts attention from more common but less severe accidents, then such accidents not only can continue, but actually happen more frequently.

The use of discipline in conjunction with cardinal rules also can create problems with the organization's safety culture. The common thinking around this subject seems to be if these rules are highly important, there should be a zero-tolerance policy for anyone breaking or failing to follow one



of them. While such a policy can definitely send the message this set of rules is important, it also can signal the company is looking to blame and find fault rather than help employees be safer.

This especially can be problematic in organizations that fail to address workplace conditions or systems that impact safety. The combination of leaders ignoring conditional safety while blaming workers for behavioral safety violations is a formula for a bad safety culture. This was the case with a recent client that already had trust issues with

their represented workforce and then implemented cardinal rules for which workers could be fired for a single violation. The cardinal rules instantly were labeled as an excuse for bypassing the usual system to dismiss an employee and not viewed as having anything to do with trying to improve safety.

Like any other safety effort, the methods used to implement cardinal rules almost was more important than the rules themselves. While some organizations implemented the new rules with a top-down, dictatorial style and



followed up with swift and merciless discipline, others postured the rules as a reflection of deep caring for the lives and well-being of workers, and followed up with focus group discussions of how the new rules were going and what could be done to facilitate them. The names given to the rules reflected this difference: one organization called theirs “one-strike rules” and another called theirs “actions to live by.” While the implementation style was more important than the name, the name definitely signaled to the workforce of each organization the tone of what was to follow.

Many organizations that truly value safety and want to achieve excellent performance continue to do things that work against their purpose. Cardinal rules for safety are not automatically such, but can be if not done with great care and strategic thinking. The very term “rule” implies an attempt to control, which, in turn, implies workers are the problem, rather than the customers of safety.

Making workers aware of the precautions that can prevent the most severe accidents is a noble thought. Creating a system of automatic blame and punishment around that awareness can be not only ignoble, but ineffective. **EHS**

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