The Internal Responsibility System

Workplace Safety North
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Famous Canadian Inventions

The telephone
Insulin
The zipper
The United Nations Declaration of Rights
The snowmobile
The Blackberry
The Internal Responsibility System
The Internal Responsibility System

It came from the mining industry in northern Ontario ...

...and spread across all sectors and all provinces and on to other countries.
We Want:

Zero Loss
How?

Reduce risk as low as it can reasonably go

(and keep the pressure on)
How?

Everyone does everything they reasonably can, 100% of the time.
Internal Responsibility System

Everyone is personally and directly responsible for health and safety as an intrinsic part of their job.

Work and OHS are not separate activities.

Everyone is doing OHS 100% of the time.
Basic Structures of the IRS:
Authority, Responsibility, Accountability
Responsibility Vs. Accountability

- Problem Solving and Cooperating
- Compliance and Reporting
- Problem Solving and Decision Making
- Compliance

- Standards and Training
- Resources, Staffing
- Programs and Planning

- Systems and Culture
- Values/Policy/Vision

(Strahlendorf, 2005)
Creative Improvement and Problem Solving in the IRS

Decision Cycle

1. Solving Problems
   - Defects
   - Anomalies
   - Contraventions
   - Dangers
   - Conflicts

2. Creative Improvements in Processes

Next Level Up

Co-Operation

Report up

Issues become:
- fewer
- more abstract
- system-wide
- value-laden
- re external environment
- longer term

Director

President

V-P

Manager

Supervisor

Worker
1. **ERS** and **IRS** – it’s not the government’s job to directly make your workplace safe for you.

2. **Within the IRS** – it’s everyone as an individual – it’s not the Committee’s job to make your workplace safe for you.
Internal Responsibility System

• 35 years old (in name)
• Mis-described, misunderstood, under-utilized
• Confirmed repeatedly: Burkett, Mckenzie-Laskin, MacDonald, Richards, Dean
  enquiries/commissions
Dean Report 2010, etc.

• Endorsed the IRS (once again).
• Focused on H&S representatives and Committees.
• Chief Prevention Officer
• New strategy – training
• MOL Blitz – this summer – the IRS
Rebirth of the IRS

The IRS is the intellectual or philosophical framework that knits together and makes sense of all of our big ideas in OHS.

The IRS helps resolve many of our current issues in OHS.
Rebirth of the IRS

1. It’s a framework for due diligence
2. It animates the OHS Management System
3. It’s 90% of what people call a “Safety Culture”
4. It resolves conflict between a “systems approach” and behaviour-based safety (BBS)
5. It overcomes complacency and plateauing
6. It has evolved to a “Phase Two” – quality and creativity.
The Internal Responsibility System

• The philosophy behind the OHSA
• The IRS is a way of allocating responsibility, authority and accountability for safety that precedes law
• First named in the 1976 Ham Royal Commission Report
• Not mentioned directly in OHS legislation, except NS
James Ham

James Ham got it right in 1976:

1. OHS should be integrated into production; it’s not a separate function.
2. Everyone should be doing OHS directly as part of his or her job.
The Internal Responsibility System

- Followed across Canada
- Often mis-described
- An OHS Act may or may not be based on the IRS. It may or may not inadequately portray the IRS.
Power of the IRS

It is the only philosophy that captures the knowledge, experience, skill, insight, observational position, initiative, creativity and enthusiasm of every human mind in the workplace.

It is the ultimate expression of respect for the human element in the workplace.
Power of the IRS

• The IRS is the “people framework” around which the management system is built.
• An OHS management system without the IRS is lifeless.
• Programs and techniques are built on top of and around the IRS.
• A weak IRS will sabotage any other OHS initiative.
The IRS is about Values

- Life and health
- Personal responsibility
- Openness
- Objective problem-solving
- You are your brother and sister’s keeper
Does a Well-functioning IRS Actually Reduce Risk?
IRS audit in 6 Ontario mines showed that an IRS audit can measure the IRS and that a high IRS score goes with a low accident rate, while a low IRS score means more accidents.

The results from 4 of the mines (the other 2 didn’t have appropriate data) were:
LTI = 5.3 - 0.12("Score")  r = 0.94

TMI = 31 - 0.53("Score")  r = 0.99

"Score" (Q1a*Q1b) of IRS effectiveness based on workers' responses
MOL Study Definition of IRS

“The IRS is a system, within an organization, where everyone has direct responsibility for health and safety as an essential part of his or her job. An individual does health and safety in a way that is compatible with the kind of work that person does. Each person takes initiative on health and safety issues and works to solve problems and make improvements on an on-going basis. A person does this both as an individual and in co-operation with others.”
Wrong Descriptions of the IRS
Wrong IRS Description

“IRS is just a set of three rights:
1. To know about hazards
2. To refuse unsafe work
3. To participate (through committee)”

Missing the main element – personal duties of everyone
The IRS as a Set of Rights?

The Right to Know  The Right to Refuse

THE IRS

The Right to Participate
Wrong IRS Description

“Labour and management co-manage OHS through the Committee. The Committee IS the IRS.”

The “labour relations” version of the IRS. Missing personal contribution of individuals.
The IRS as Bipartitism?
Wrong IRS Description

“The company/employer is responsible for OHS, not the government.”

Fails to raise the “corporate veil” and identify all individuals as personally responsible.
Wrong IRS Description

“The IRS is a good OHS management system.”

The IRS is part of the management system – not a competing idea, nor is it synonymous with it.
The IRS is NOT …

- An OHS management system
- An off-the-shelf program you buy
- Something you don’t have
- A “partnership” between labour and management
- Collectivist (groups)
The IRS is NOT …

• Bipartite
• Labour relations
• The health and safety committee
• Primarily about rights
• The same as due diligence
• Regulatory compliance
The IRS is …

- An element of the OHS management system
- Something you already have
- Individualistic
- About the personal responsibility of each individual
- Is primarily about duties
The IRS is …

- Is monitored and supported by the committee
- Is connected to due diligence (tells us who must be duly diligent)
- If it works well will ensure regulatory compliance
Where Does the IRS Come From?
Accident Theory & IRS

Descriptive
1. Who can cause an accident? Anyone
2. Who can prevent an accident? Anyone

Prescriptive
3. Who SHOULD prevent accidents? Everyone
4. Who SHOULD be doing OHS here? Everyone
The People in the Accident Process
IRS to Duties to Due Diligence

• Anyone can cause an accident so everyone should be doing OHS as part of their job.
• So there should be duties for everyone as an individual, not just the employer.
• Everyone should be duly diligent, not just the employer.
• If they are, then risk is driven down as low as it can reasonably go, and we go for very long periods without losses.
The Legal Duties Match Causation
IRS as Framework for Due Diligence

What people do and don’t do to avoid accidents is their personal due diligence.

• IRS – “I’m responsible”
• DD – “How far do I go?”
Workers

- Following regulatory procedures
- Following employer's procedures
- Following supervisor's procedures
- Identifying defects, contraventions and dangers
- Using initiative to reduce risk
- Applying discretion to solve OHS problems
- Reporting unresolved problems
- Working cooperatively with co-workers, supervisors and others
Supervisors

• Using initiative to reduce risk
• Applying discretion to solve OHS problems
• Responding properly to reports
• Encouraging reports
• Training
• Ensuring qualifications
Supervisors

• Safety talks
• Job planning
• Tailboard conferences, pre-job briefings
• Coaching
• Job observation
Supervisors

• Post-job assessments
• Enforcement of rules and regulations
• Discipline
• Working cooperatively with workers, other supervisors, managers and others
• Taking unresolved problems to senior management
Managers

• Using initiative to reduce risk
• Engaging in leadership activities for OHS
• Applying discretion to solve OHS problems
• Responding properly to reports
• Encouraging reports by supervisors
Managers

- OHS performance evaluation
- Holding others accountable
- Developing, implementing programs
- Post-project/program assessment
- Properly allocating resources
- Staffing decisions
Managers

- Considering system wide problems
- Taking unresolved problems to senior management
- Working cooperatively with workers, supervisors, other managers and others
Executives

- OHS Policy
- Ensuring the development of an OHS system
- Ensuring periodic "system audits"
- Responding properly to reports by managers
- Ensuring that a proper IRS is functioning
- Ensuring that competent professionals are hired
Executives

- Sufficient resource allocation
- Leadership — taking initiative; inspiring others
- Holding subordinates accountable
- Considering system wide problems
- Taking appropriate, unresolved problems to the directors
Directors

• Setting the broad vision for OHS performance
• Ensuring that the officers are capable and motivated to establish and maintain the IRS and the OHS management system
• Requiring evidence that in fact the IRS and OHS system are functioning well
• Responding properly to reports by officers
• Holding the officers accountable for their OHS performance
“IRS Analysis”

Once you really understand the IRS it changes everything …
“IRS Analysis”

Analyze every OHS issue in terms of the underlying IRS, e.g.:

- Inspections
- Investigations
- Complaints
- Orders
- Recommendations
- Work Refusals
- JHSC Activities
“IRS Analysis”

1. What went wrong with the IRS?...fix it.

2. What could go wrong with the IRS?...avoid it

3. How can we strengthen the IRS?
“IRS Analysis”

IRS Phase One:
We think of failures in the IRS as failures to raise problems about defects, contraventions and hazards.

IRS Phase Two:
We think of failures in the IRS as failures to be creative, to seek improvement.
Auditing the IRS

It can be measured.
It can be improved.
IRS Audits

We “audit” the workplace and we do “system audits” of the OHS management system.

Can we directly audit the IRS?

Yes, survey individuals at all levels.
IRS Audits

Surveys, interviews and observations to measure the health of the IRS at each level of the organization; identifying strengths and weaknesses with a view to correction

• 12 different questionnaires
• 40-50 questions each
IRS Audits

Ask questions about:

- understanding
- beliefs
- cooperation
- communication
- involvement
- response time
- recognition for initiative
Safety Culture

The IRS is 90% of what people mean when they talk about a “safety culture”

Most “perception surveys” are attempts to measure the IRS.

We do a better job with both with a clear understanding of the IRS.
IRS Audits

Ask questions about:

- individual’s perception of how others are performing in the IRS
- whether “IRS analysis” is applied to problems
- whether internal failsafe devices are working
- about behaviour in addition to beliefs
IRS Audits

• We can measure the climate for the IRS Phase Two
• We ask questions about being encouraged to come up with new ideas, about what happens to new ideas, about senior management’s perceived commitment to creativity.
Worker

Within the last year, has your supervisor emphasized how important it is to bring your health and safety complaints directly to him or her?

Within the last year, has your supervisor asked you to go beyond concerns and complaints and actually come up with new ideas to improve health and safety your work?
Worker

Within the last three months, have you made complaints to your supervisor about health and safety:

Within the last three months, have you given any new ideas to your supervisor on how to improve the work process?
Worker

My supervisor responds promptly and appropriately to every complaint by me about health and safety:

My supervisor responds promptly and appropriately to my new ideas on how to improve work processes:
Within the last year, has your supervisor discussed with you ways of improving how you can encourage your people to take initiative and come up with new ideas to improve work practices so work will be safer?

Have you taken steps to ensure that your people understand that you want them to do more than just follow the safety rules—that is, that you want them to think of new ideas to improve work practices so work will be safer?
Supervisor

Within the last month, has at least one of your people taken initiative (without your asking) and suggested new ideas to improve health and safety performance?

Within the last three months, have you taken the initiative (without your supervisor asking) and suggested to your supervisor new ideas to improve health and safety performance?
Within the last month, has at least one of your people taken the initiative (without your asking) and suggested new ideas on how to improve health and safety performance?
Senior Manager

We have effective ways of sharing, between different areas and work crews, *new ideas* about improving the work:
IRS Audits

• We can find where exactly the IRS is working well, and build on our strengths.

• We can find where the IRS is weak and needs strengthening.
Due Diligence and the Management System
Due Diligence
and the OHS System

The OHS System should enable each individual and the organization to be duly diligent and to provide the evidence of due diligence should it be needed.

Too often the OHS management system is referred to only in the context of the employer’s due diligence.
What are the Elements of an OHS System?

An Occupational Health and Safety (OHS) System is comprehensive (covering all functions, positions and activities) and is workplace-specific.
What are the Elements of an OHS System?

1. An OHS Policy Statement that provides the overarching set of values that the OHS System is designed to promote;

2. A set of prescriptive Principles that further develop the meaning and intent of the OHS Policy Statement;
What are the Elements of an OHS System?

3. Organizational Statements that outline the distribution of authority, responsibility, and accountability for OHS throughout the organization; i.e. the IRS.

4. An interlocking set of OHS Programs, where each Program is associated with a set of OHS concerns and sets out the responsibilities, procedures, standards and so forth that address those OHS concerns; and
What are the Elements of an OHS System?

5. Special OHS programs, the Change Control Program and the OHS System Audit program, which ensures that the other system elements are implemented, maintained current and are continuously improved.
Continual Improvement

Management Review and Improvement

Measurement and Evaluation

Commitment and Policy

Planning

Implementation
Systems and Due Diligence

The OHS management system should have processes for identification of hazards and risk assessment. Novel or specific or unusual hazards that are not covered by the regulations will be caught and system controls developed. This will help ensure that the general duty clauses are complied with.

Other programs in the OHS management system will be designed to comply with specific requirements in the regulations, e.g. WHMIS.
Distinction -- Problem

Some people adopt an extreme “systems approach”. All accidents are caused by the root causes in the OHS management system. “People don’t cause accidents, systems do.”

Some people adopt an extreme worker behaviour approach. All accidents are caused by the unsafe behaviour of workers. “Systems don’t cause accidents, people do.”
Linking Systems and People

In the diagram below, if everyone is engaged in due diligence activities appropriate to their level of authority in the organization (the IRS), and those due diligence activities are elements of the OHS management system, then we speak of systems and people simultaneously and never systems alone or of people alone.
IRS

Accident Causation

Due Diligence

Director

President

V-P

Manager

Supervisor

Worker

- Principles
- Policies Systems
- Programs
- Programs
- Coaching Problem-solving etc.
- Initiative Problem-solving Conformance Reporting
Linking Systems and People

In the diagram above, imagine all individuals in the IRS have a list of OHS management system elements they are personally responsible for taped to their backs. Imagine that the OHS management system elements described in that 3-ring binder each list the names or positions of the people who will carry out some aspect of the system element.
Systems -- Behaviour

• People and their behaviour are on the left of the diagram.
• OHS Management system elements are on the right of the diagram.
• Individuals know which elements of the MS they’re responsible for.
• Every element of the MS lists who’s responsible for it.
• Always speak of people and MS elements simultaneously.
• Resolves the “systems” – BBS conflict.
Summary
The Internal Responsibility System is:

- A set of responsibilities for every individual in the organization
- A hierarchy of responsibility, authority and accountability
- A set of values and principles
- A system of processes and activities
- A pattern of individual creativity
- A true “system”. It has built devices for monitoring, feedback and control
IRS Phase One …

• Gets you to “pretty good”
• Is only about OHS
• Is essentially negative
• Is about preventing losses
• Is about finding bad things
• Is closely associated with legal duties
• Runs out of motivation for safety after some success
IRS Phase Two …

- Gets you to world class status
- Is about years without lost time accidents
- Is about creativity
- Is about using “local knowledge”
- Is about motivation for safety other than safety
- Is about high performance for environment, cost reduction, productivity as well as safety
- More than pays for itself
Rebirth of the IRS

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5. It overcomes complacency and plateauing
6. It has evolved to a “Phase Two” – quality and creativity.
IRS, Due Diligence, Risk and Quality

If everyone in the IRS is personally taking every measure reasonable to continually improve processes he or she is involved in, we can drive risk down as low as it can reasonably go. Tomorrow, we drive it down a little further. The lower the risk, the longer we can go with zero accidents.
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www. 4sconsult .com