I don't have a SOP for that issue.

Insights

6.27.19

I recently talked to a group of managers about misusing Standard Operating Procedures (SOPs) and the resulting safety and performance problems. Issues raised, included:

- Employees justifying bad judgment by claiming that there was no SOP requiring them to perform a task in a safe fashion.

- Managers refusing to require employees to perform a task safely and in a common-sense way because there was no written SOP.

- Confusion about the roles of SOPs, work guidance, and policies.

- Conflict between unduly complicated SOPs and the actual steps to safely perform the task.

Below are some observations and recommendations that we discussed over lunch:

Written guidance is not a substitute for using good judgment.
Employers must train employees to use their good judgment in determining how to safely perform a task. In highly regulated environments such as government labs, pharmaceutical manufacturers and nuclear power plants, employees may become scared to use their own judgment or have simply ceased to think that way. It is probably impossible to anticipate and list every conceivable detail about tasks, and if one did so, it would be so long that no one would consult it.

Managers should not try to excuse their failure to manage employees by claiming that they could not require employees to comply with safe practices because no written SOP existed. Was a practice understood and acknowledged? Did the employee's actions go against broad safety areas such as fall-protection, LOTO, or guarding?

Determine the role of the SOP.
Is the SOP a high-level reference to guide in the development of simple work steps? Is it the document to which you will train employees? Is it their day-to-day guidance?

If you determine to include in the SOP the applicable safety guidance, identification of hazards, and required PPE, ensure that all necessary elements are included.

Some employers incorporate the required information of a Job Safety Analysis (JSA) into SOPs, which makes sense from a training standpoint because one should integrate safety into how to do

the job. However, if the SOP serves as the JSA, make sure it meets all requirements of <u>1910.132.</u>

Be wary of developing unwieldy overly long SOPs. No one will read them; let alone follow them.

Consider whether one needs both a lengthy SOP as a reference and a shorter guideline to be followed on the floor. Avoid conflicts and differences between the documents.

Some degree of centralized planning and coordination is necessary for large organizations with multiple locations. However, be wary about taking a top-down approach of dictating what each location must do. Sites vary. Processes, culture, and workforces may present differences requiring site-specific approaches. It creates problems to maintain a Corporatewide SOP which does not fit and is not followed by a site.

Recommendations.

1. Set priorities for which SOPs need to be in writing.

2. Train managers and supervisors to use their judgment, apply facts to the SOP, and seek thoughtful consistency.

3. Seek brevity. People have trouble following more than six steps.

4. Use practical photos and drawings.

5. Consider for whom you are writing the SOP.

6. Consider language and literacy issues – cartoons, photos, and drawings make be necessary.

7. Review and test the SOP with experienced employees.

8. Check to see if the SOP "works."

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Workplace Safety and Catastrophe Management