

# Controlling Behaviors Through Audits

Presented By BHHC Loss Control  
December 2025

# 94%

It is now estimated that only 6% of workplace accidents are caused by environmental factors - unsafe conditions, OSHA violations, dangerous equipment, etc., while the remaining 94% of accidents are caused by unsafe behavior.

- Gene Earnest and Jim Palmer,  
Proctor & Gamble

# 88%

Heinrich's Original study of accident causation, 88% of accidents are caused by unsafe behaviors

- Herbert William Heinrich, Travelers Insurance 1931

# Workforce Solutions Provider Needs Help

## Background

A workforce solutions provider, faced rising safety incidents and workers' compensation costs across its logistics operations.

## Challenge

High incident rates and escalating costs prompted leadership to seek a proactive safety strategy.

# Reduced Accidents and Reduced Costs

## The Effort

In 2021, the company launched a Behavioral-Based Safety Observations program focused on identifying unsafe behaviors and reinforcing safe ones in real time.

**Implementation:** Supervisors conducted regular observations, called out unsafe actions, and celebrated safe practices to build a safety-first culture.

## Outcomes

- 40% reduction in OSHA-recordable accidents within months.
- 25% drop in workers' compensation costs over next three years.
- Increased employee engagement and accountability around safety.
- Safety became a shared value across all locations, transforming the culture and improving operational efficiency

# AGENDA

November 2025

1. How Safety Observations Fit into Your Overall Accident Prevention Efforts
  - Prepare To Conduct a Safety Observation
  - The Role of SOP's and JHA's
  - Deciding to Tell or Not to Tell
2. Performing Safety Observation
3. Coaching Towards Desired Behavior

# We Will Focus on Best Practices

- The goal of an employee safety effort is to prevent injuries and increase the involvement of staff in your safety efforts.
- Regulatory standards are *minimum* requirements. Best in class employers go above and beyond.
- Remember that every workplace is different. Find the risk potential and address it proactively.





# How Safety Observations Fit Into Your Overall Accident Prevention Efforts

# ROLE OF SAFETY OBSERVATIONS



## IDENTIFY UNSAFE BEHAVIORS

Observe and recognize risky actions



## REINFORCE SAFE PRACTICES

Encourage adherence to safety procedures



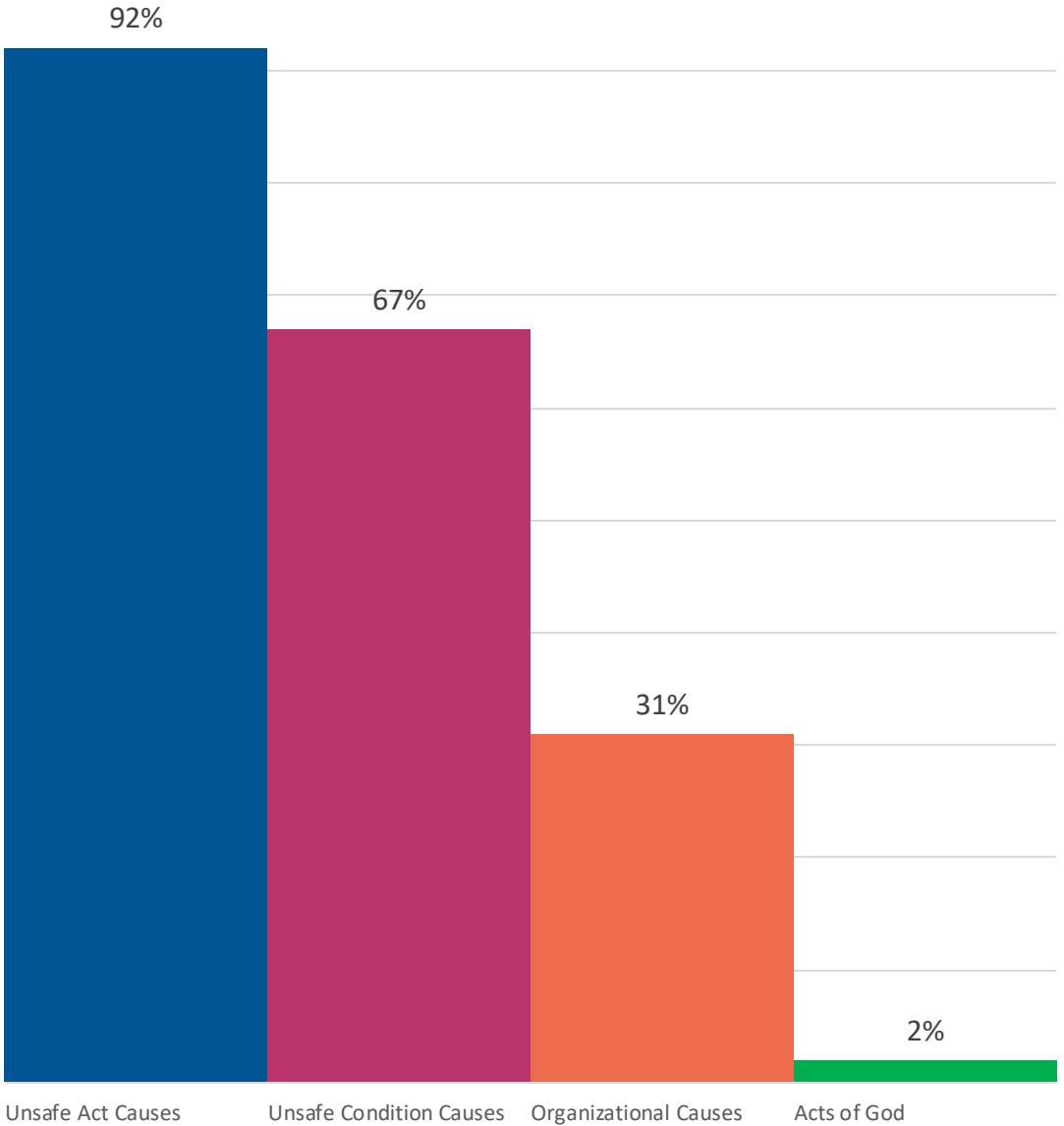
## PROVIDE FEEDBACK

Discuss positive and negative findings



## PREVENT INCIDENTS

Address hazards before they cause harm

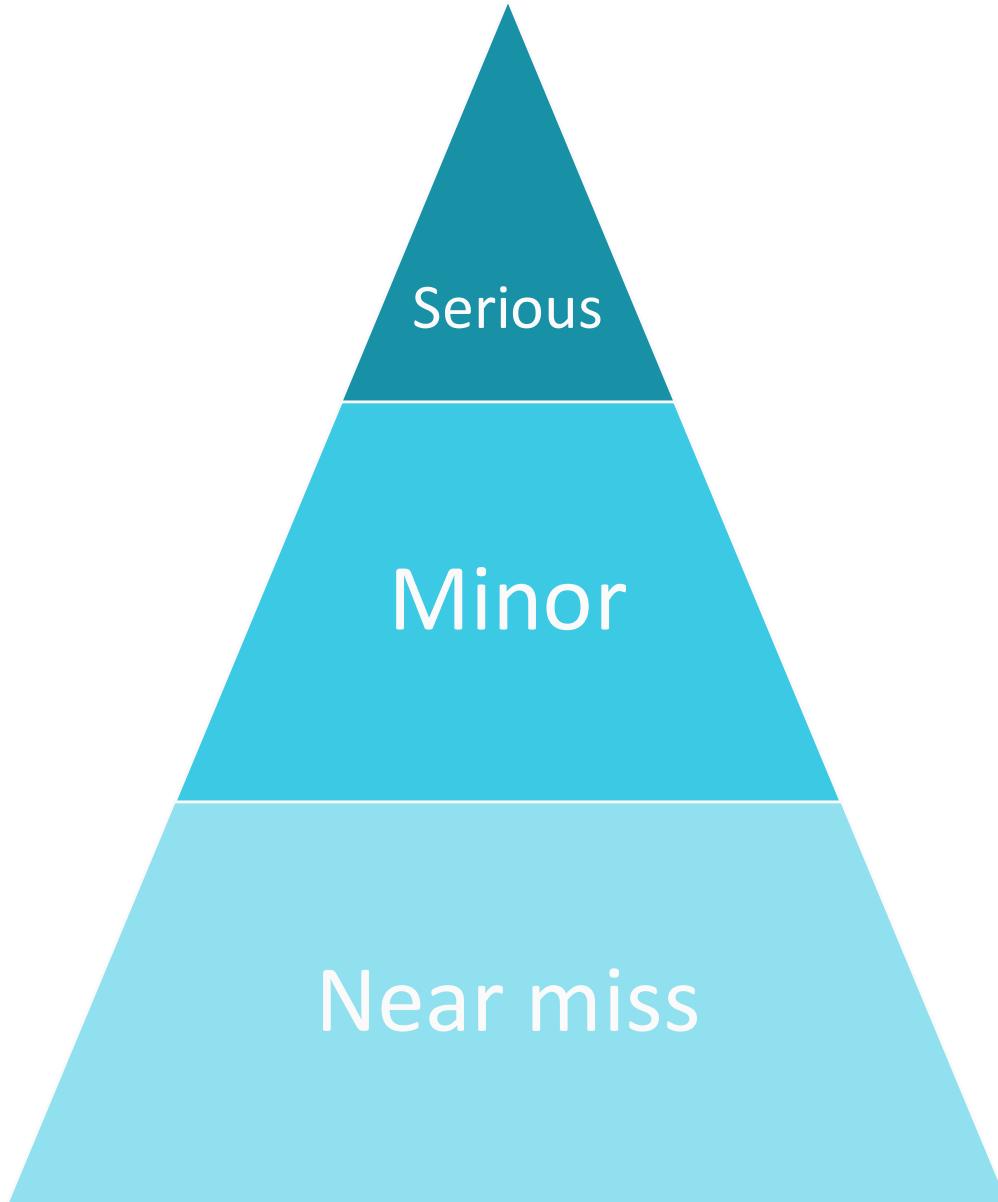


# Multiple Causation Theories

Accidents are rarely the result of a single cause

They occur due to a combination of factors:

- Domino Theory
- Multiple Causation Theory
- Human Factors Theory
- Systems Theory
- Epidemiological Theory



## Accident Triangle (adjusted)

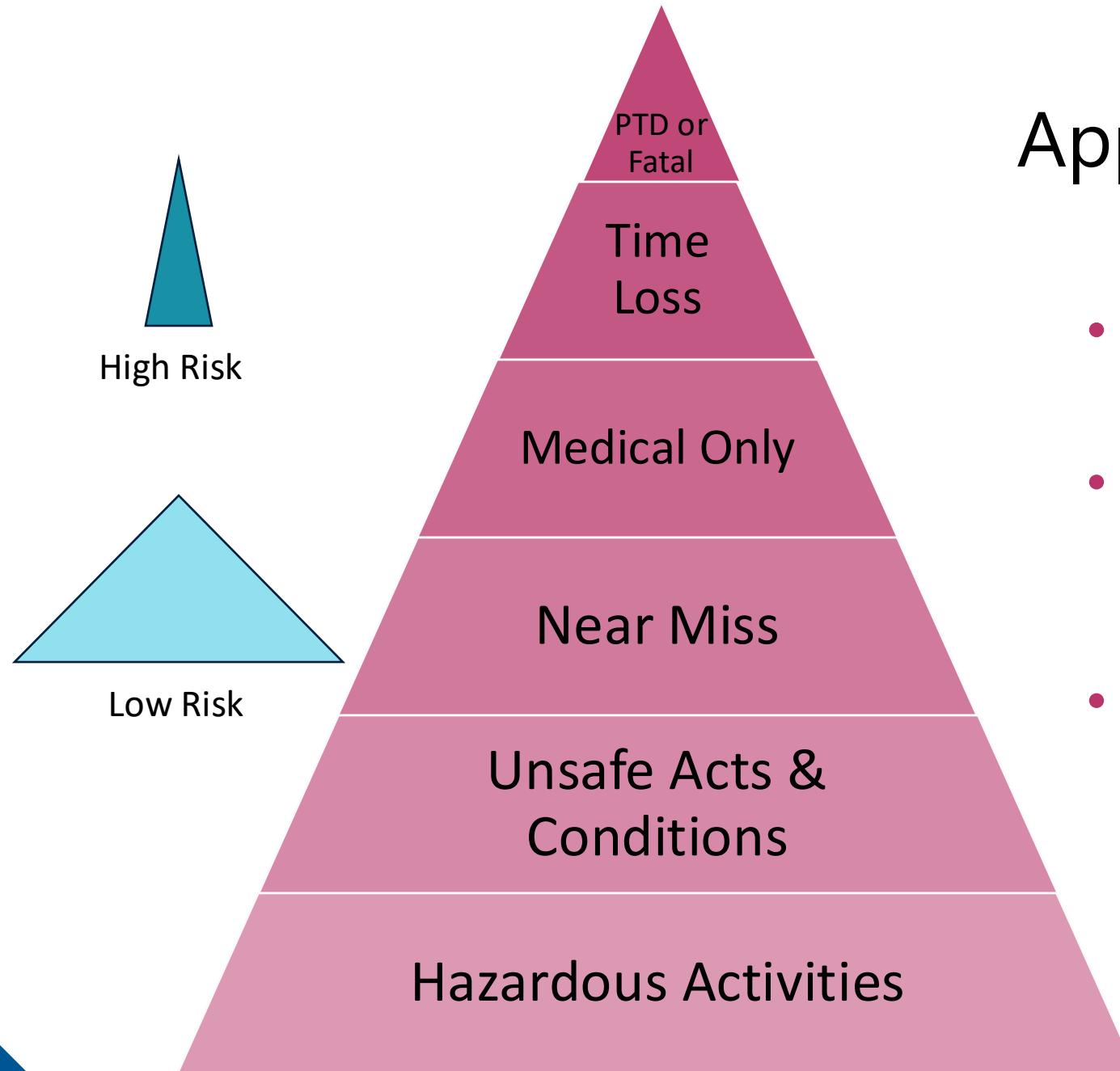
1931 Heinrich looked at 75,000 accidents

- 1 Serious Accident
- 29 Minor Accidents
- 300 Near Misses

1966 Bird analyzed 1.7 million accidents

Updated Triangle:

- 1 Serious Injury
- 10 Minor Injury
- 30 Damage-Causing Accidents
- 600 Near Misses



## Applying the Theory

- Layers permanent total disability or fatality at the top
- Time loss, medical, near miss, unsafe acts and conditions, and activities underneath
- Base of the triangle varies by hazard – narrower base the higher risk



# Safety Observations Focusing on the Bottom

- Check the effectiveness of training programs
- Promote on-the-spot correction of unsafe acts
- Provide opportunities to compliment and/or reward safe behaviors
- Develop cooperative safety attitudes
- Promote more learning about employees
- Suggest and identify better job methods

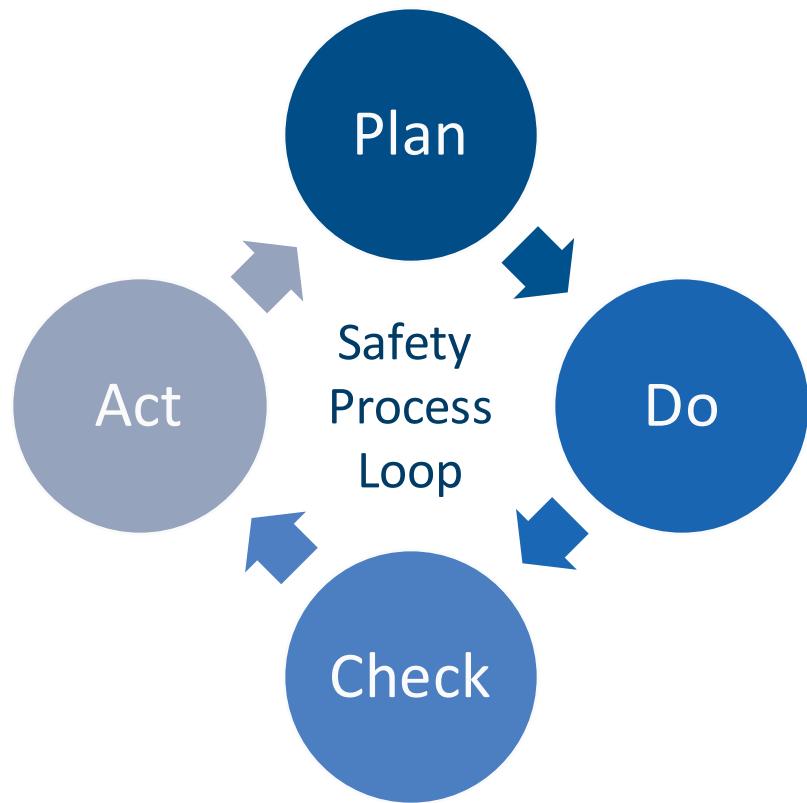
# Standard Operating Procedures (SOPs)

| ELEMENT                   | DESCRIPTION   |
|---------------------------|---|
| Task Definition           | Specifies what the employee is expected to do                             |
| Step-by-Step Instructions | Details how to perform each task safely and efficiently                   |
| Training Tool             | Used for onboarding and refresher training                                |
| Compliance                | Ensures adherence to quality, production, timeliness and safety standards |
| Foundation for JHA        | Provides task breakdown for hazard analysis                               |

# Job Hazard Analysis (JHA)

| JHA COMPONENT          | DESCRIPTION   |
|------------------------|---|
| Hazard Identification  | Analyzes each SOP step for potential risks – Supervisor and employee review job with SOP as guide |
| Risk Assessment        | Evaluates likelihood and severity of hazards  |
| Control Measures       | Recommends engineering, administrative, or PPE controls   |
| Worker Protection      | Ensures employees understand safety protocols   |
| Continuous Improvement | Updates JHA with changes in tasks or environments   |

# Preparing for the Observation



## Identify who needs an observation

- New hires, change in position, outside influences, hazardous operations, other

## Decide what you are looking for including job steps, hazards, and proper controls:

- Job Specifications, Job Hazard Analysis, Care Plan are all sources of data
- Look at a scheduling of tasks in the workday and ensure observation coincides to task
- Decide if you should tell the employee prior to completion of the observation



# Who Needs an Observation

- New hire
- Transfer employee
- Returning after leave of absence
- Traumatic event
- Positions with high defect rate
- Positions with significant changes in productivity
- Positions with high accident rates
- Non-routine tasks
- Other

# What are you going to observe?

## Job Step Review

- Review the SOPS
- Review and use the JHA
- What are the critical behaviors?
- Consider recent incidents or near misses
- Observation guides

| Job Safety Analysis  | Type of job: Helping to hitch an implement (wagon, machine) to a tractor  |  |
|--|---|--|
|  | Date: March 3, 2003   |  |
| Personal Protective Equipment to be worn: Work boots with steel toe, shank, leather gloves       |   |  |
| Basic Job Steps  | Potential Hazards   | Recommended Action or Procedure  |
| Check the position of the implement wheels.  | Implement could roll when tongue is picked up, causing a crushing injury.   | Check that the wheels of the implement are blocked.  |
| Check the position of the implement tongue.  | Straining the back if the tongue is heavy.  | Use blocks to keep tongue at hitching height, squat down and use leg muscles to lift rather than bending over and lifting with your back; use implement's jack stand if it has one; use temporary jack if tongue is heavy and implement doesn't have a jack stand. |
| Have tractor driver back to within a few inches of implement tongue.                             | Crushed between tractor and implement if tractor operator miscalculates while backing. Run over by rear tractor tire.                     | Stand outside of tractor and implement until tractor driver stops tractor.<br><br>Use hand signals.  |
| Helper moves in to align implement tongue and pin hole with tractor and pin hole.                | Crushing injury to the hands or body.   | Keep hands in back of drawbar connection point. Wear leather gloves. Tractor operator backs with low gear and low engine speed.  |
| Insert drawbar pin to connect tractor with implement. Insert safety pin or attach safety chains. | Helper can be run over by tractor implement; suffer crushing injury to the feet if the implement tongue slips off of the tractor drawbar. | Operator puts tractor in park or sets brakes before helper drops in the hitch pin. Helper steps from between tractor and implement before tractor operator moves tractor. Helper wears steel-toe work boots.   |

# Observation Guides

## Hazard Specific & Job Focused

**BH HC**

### Safety Observation: Manual Lifting

#### Hazard Control Toolkit

**SPECIFIC RISK FACTOR(S) IDENTIFIED**

Please check the items below where improvement is possible in order to address the risk factor

**MANUAL LIFTING**

| NEEDS FOCUS | RISK FACTOR IDENTIFIED                     | CORRECTIVE ACTION APPROACH |   |   |   |   |
|-------------|--|----------------------------|---|---|---|---|
|             |  | A                          | B | C | D | E |
|             | Body position (steps out of neutral)       |                            |   |   |   |   |
|             | Gripping Surface                           |                            |   |   |   |   |
|             | Grip Method                                |                            |   |   |   |   |
|             | Use of Mechanical Lift Assisting equipment |                            |   |   |   |   |
|             | Twisting <sup>4</sup>                      |                            |   |   |   |   |
|             | Bending at Waist (Below knee work)         |                            |   |   |   |   |
|             | Weight Limits                              |                            |   |   |   |   |
|             | Two or More Person Lifts                   |                            |   |   |   |   |
|             | Stretching                                 |                            |   |   |   |   |
|             | Other (List):                              |                            |   |   |   |   |
|             | Other (List):                              |                            |   |   |   |   |
|             | Other (List):                              |                            |   |   |   |   |

A: Redesign Task to reduce manual lifting (engineering)  
B: Retraining  
C: Work with a mentor  
D: Share with Team  
E: Increase frequency of safety observations

| Corrective Action Plan | Responsible Party | Corrective Action Date |
|------------------------|-------------------|------------------------|
|                        |                   |                        |

**BHHC Loss Control - Because everyone deserves to be safe, valued and respected.**

 **Remarkable Construction Safety Observation Checklist**

| Description                           | Used Properly         | Not Used Properly     | N/A                   |
|---------------------------------------|-----------------------|-----------------------|-----------------------|
| 1. Tailgate Discussion                | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| 2. Wheel Chocks                       | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| 3. Personal Protective Equipment      | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| a. Hard Hat                           | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| b. Eye/Face Protection                | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| c. Hearing Protection                 | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| d. Hand Protection                    | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| 4. Traffic Control Devices            | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| a. Cones                              | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| b. Signs                              | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| c. Flagman with Proper Equipment      | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| 5. Vehicle Grounds                    | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| 6. Personal Grounds                   | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| 7. Rubber Gloves and/or Sleeves       | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| 8. Cover-up Material                  | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| 9. Fall Protection                    | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| a. Climbing Belt and Safety Strap     | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| b. Harness (full body)                | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| c. Lanyards                           | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| d. Ladders Secured                    | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| 10. Proper Equipment Use and Location | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| 11. Trench/Shoring                    | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| 12. Safety Signs                      | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |

**Comments**

# Benefits of Structured Data Collection

## Trend Analysis

- Better understanding of risks and safe practices
- Increased vigilance and proactive behavior

## Focus department and company training

- Clear guidance helps employees feel more capable and secure in their roles
- Ensures consistent competencies for staff

| CheckList: Construction - 1926  |     |     |       |      |
|---|-----|-----|-------|------|
| Users: All Users  |     |     |       |      |
| Category: All Categories  |     |     |       |      |
| Company: All Companies  |     |     |       |      |
| Date Range: 6/1/2018 - 9/30/2018  |     |     |       |      |
| Total Inspections: 82   |     |     |       |      |
| Aerial/Boom Lifts   |     |     |       |      |
| Workers tied off to approved anchorage point in basket? 1926.453(b)(2)(v)     | Pos | Neg | Total | %    |
| 38  | 13  | 51  | 75%   |      |
| Workers not tied off to adjacent structure/equipment? 1926.453(b)(2)(iii)     | 17  | 2   | 19    | 89%  |
| Operator(s) trained and/or authorized? 1926.453(b)(2)(ii)                     | 26  | 6   | 32    | 81%  |
| Both feet on floor of basket? 1926.453(b)(2)(iv)                              | 11  | 19  | 30    | 37%  |
| Boom/basket load limits not exceeded? 1926.453(b)(2)(vi)                      | 9   | 4   | 13    | 69%  |
| Aerial lift stationary when elevated? 1926.453(b)(2)(viii)                    | 10  | 2   | 12    | 83%  |
| Aerial lift controls clearly marked/identified? 1926.453(b)(2)(ix)            | 6   | 3   | 9     | 67%  |
| Aerial lifts inspected prior to use/documentied? 1926.453(b)(2)(i)            | 5   | 2   | 7     | 71%  |
| Access gate/opening closed when working in lift? (ANSI/SIA A92.5)             | 4   | 2   | 6     | 67%  |
| Operated on level surface per equipment specs? (ANSI/SIA A92.5)               | 2   | 0   | 2     | 100% |
| Outriggers (when available) utilized as needed? (ANSI/SIA A92.5)              | 3   | 0   | 3     | 100% |
| Work platform kept reasonably clear of debris? (ANSI/SIA A92.5)               | 3   | 1   | 4     | 75%  |
| Are Boom Lifts operated within the wind speed service limit? (ANSI/SIA A92.5) | 3   | 0   | 3     | 100% |
| Good compliance/no safety violations? (1926.453)                              | 1   | 0   | 1     | 100% |
| Category Total  | 138 | 54  | 192   | 72%  |
| Behaviors   |     |     |       |      |
| Eyes on path/looks in direction of travel?                                    | Pos | Neg | Total | %    |
| 7   | 1   | 8   | 88%   |      |
| Looks back prior to stepping backwards?                                       | 6   | 0   | 6     | 100% |
| Pushes instead of pulls when possible?  | 6   | 1   | 7     | 86%  |
| Avoids overhead work when possible?   | 3   | 0   | 3     | 100% |
| Lifts with legs not back when possible?                                       | 2   | 1   | 3     | 67%  |
| Forms a bridge with free hand when lifting?                                   | 1   | 1   | 2     | 50%  |
| Category Total  | 25  | 4   | 29    | 86%  |

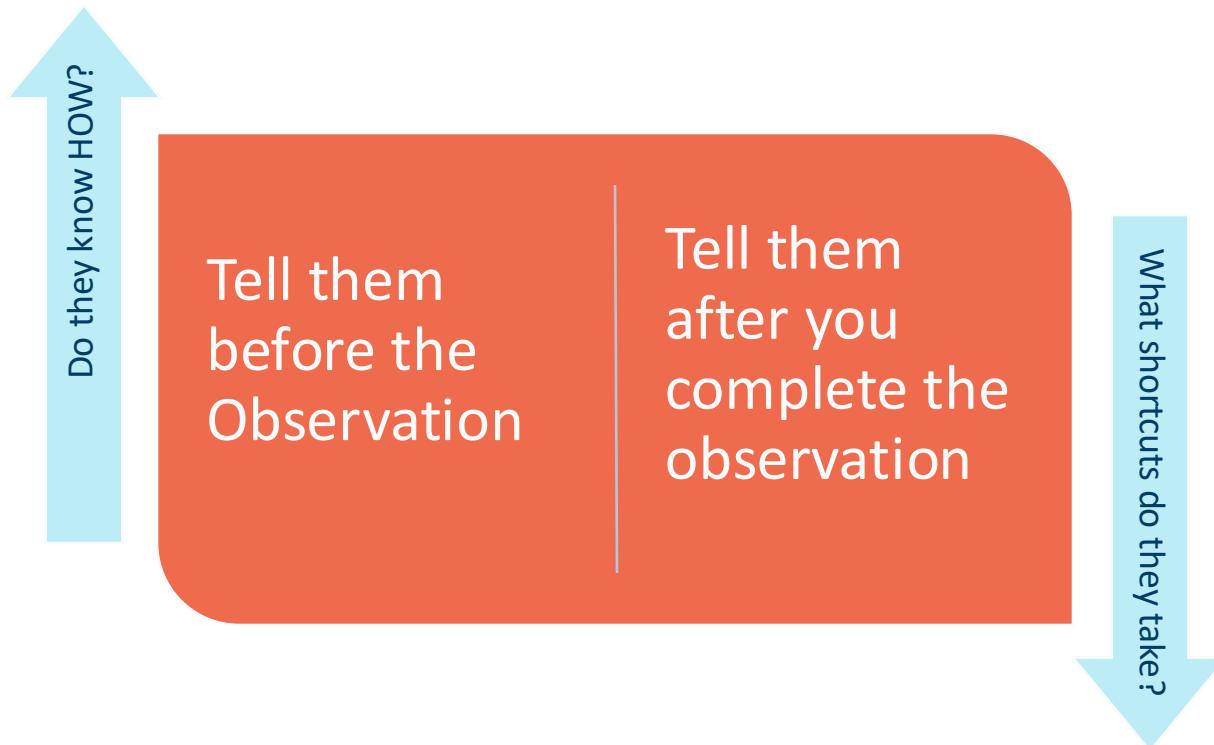


# Importance of Scheduling

- To observe high hazard activities, you must be there when they occur
  - Loading and Unloading activities
  - Charging tanks or process vessels
  - Non-Routine tasks – concrete cleaning
  - Tasks that result in injuries and accidents
  - Tasks with high defect rates
- To observe specific employees, you must work on their schedule
- Timing matters!

# To Tell or Not To Tell

When you inform the employee, it makes a difference



- Evaluate whether the employee knows *how* to do the job complete an informed safety observation
- Evaluate how the employee *performs* their work, do not inform them prior to completing the observation
- In all cases, always provide *feedback*

A photograph of three construction workers wearing blue hard hats and safety vests. They are looking upwards and to the right, possibly at a building or structure. The background is slightly blurred.

# Performing the Observation



# Performing the Observation

## Incidental Observations

- Part of other work activities
- Short observations and feedback sessions

## Deliberate Observations

- More planning and foresight
- Separate time is set aside to perform the deliberate observation

## Determining Frequency for Observations

- New Hire; 3 in first month
- Existing employee; 1 per month

# Performing the Observation

- Tell First, explain to the worker what you will be doing and for how long.
- For uninformed observations, stand out of the way and observe the employee.
- After all Observations, approach the employee, explain that you have just performed an observation and proceed with the coaching session.

Focus on **Behavior**



Describe Impact on  
Employee, Work Unit &  
Company



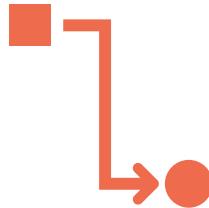
Reinforce expectations for  
Tomorrow

# Feedback: a BIT of Information



## Behavior

Make sure employee understands the positive or negative behavior that was observed.



## Impact

Link the impact to a personal level, unit level, plant level and corporate level.



## Tomorrow

What action's do you expect the employee to complete tomorrow and on.



# Feedback: Coaching Employees

When unsafe behaviors are observed, employees must be coached in the correct method

- Tell them *how* to do the task
- *Show* them how to do the task
- Have them *demonstrate* the task correctly
- Make *corrections* or *reinforce* good performance

# Elements of Effective Coaching



Ask Questions



Listen Intently



Be Non-Judgmental



Align feedback with desired behaviors



Model Strategies and Behaviors



Provide Honest Feedback

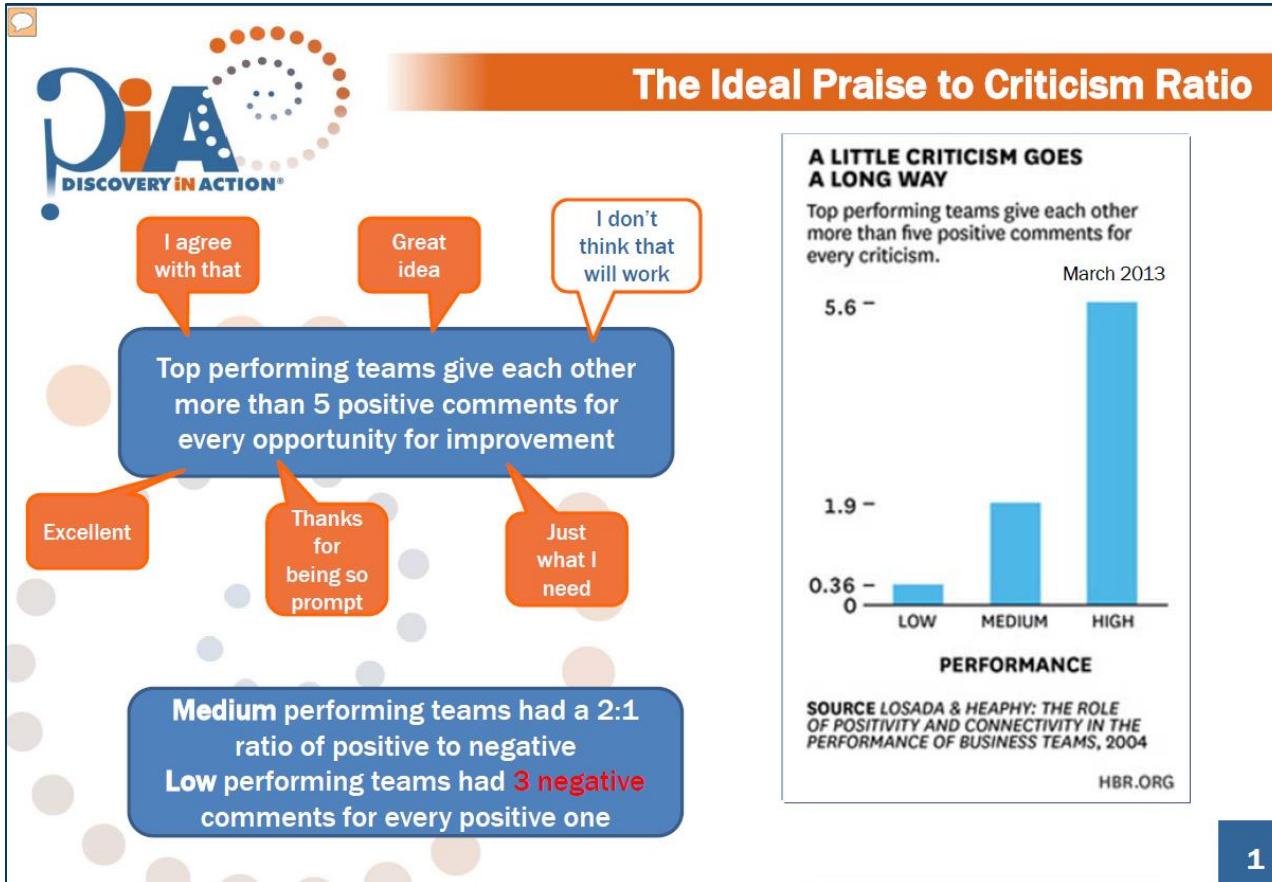


Create Safe Environment



Use Positive Reinforcement

# 4:1 Rule for Safety Observation



- Give positive feedback at least 4 times out of 5
- Reinforcement Effect: Behavior positively reinforced tends to increase or continue
- Extinction Effect: Behavior not positively reinforced tends to decrease over time
- Punishment Effect: Behavior “demotivated” by negative reinforcement tends to decrease

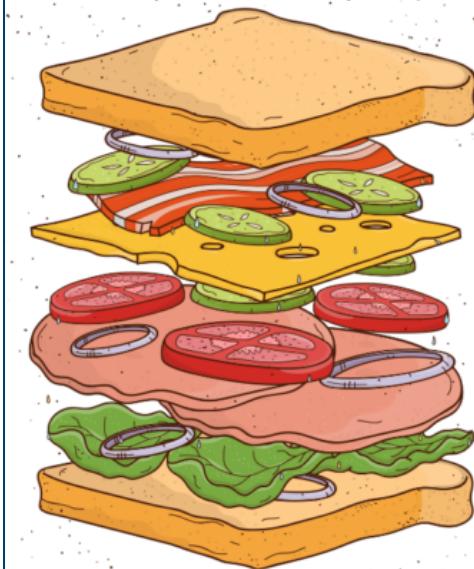
# Feedback: The Coaching Sessions

## Safety Sandwich

- Compliment
- Correction
- Compliment

- Make sure employee understands the appropriate way to perform the task.
- Have employee demonstrate key safety controls
- Always express concern for the employee's well-being when providing one on one coaching

## The Feedback Sandwich



The first positive comment

The constructive feedback

The closing statement reaffirming the positive comment

A group of construction workers in hard hats and safety vests are gathered around a tablet device, looking at it together. The background is a blurred image of a construction site with heavy machinery.

# Effective Coaching

# Common Pitfalls to Safety Coaching

## The Message

- Overemphasis on Compliance
  - Focusing only on rules without mindset
  - Leads to minimal engagement and poor understanding
- Ignoring Data and Trends
- Coaching Only After Incidents
  - Reactive rather than proactive coaching
  - Misses the chance to prevent issues before they occur
- Lack of Supervisor Training
  - Supervisors may not be equipped with coaching skills or safety knowledge
  - Leads to ineffective or counterproductive sessions.

## The Approach

- Lack of Personalization
  - Using a one-size-fits-all approach
  - Reduces relevance and impact of coaching
- Inconsistent Follow-Up
  - Coaching is treated as a one-time event
  - Missed opportunities for reinforcement and improvement
- Poor Communication Skills
  - Lack active listening or constructive feedback techniques
  - Can result in misunderstandings or defensiveness
- Failure to Build Trust
  - Coaching without safety
  - Employees may withhold concerns

# People Learn Differently



## Visual Learners

- Prefer diagrams, charts, videos, and written instructions
- Benefit from visual aids like infographics, signage, and safety walkthroughs



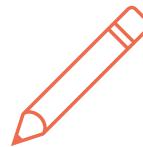
## Auditory Learners

- Learn best through listening and verbal explanations
- Respond well to safety talks, coaching conversations, and recorded briefings



## Kinesthetic Learners

- Learn by doing. hands-on practice and physical engagement
- Thrive in simulations, role-playing, and on-the-job demonstrations



## Read/Write Learners

- Prefer reading manuals, writing notes, and reviewing documentation
- Benefit from written safety procedures, checklists, and self-paced modules

# Learning Styles Impact on Safety Coaching

One-size-fits-all coaching is ineffective

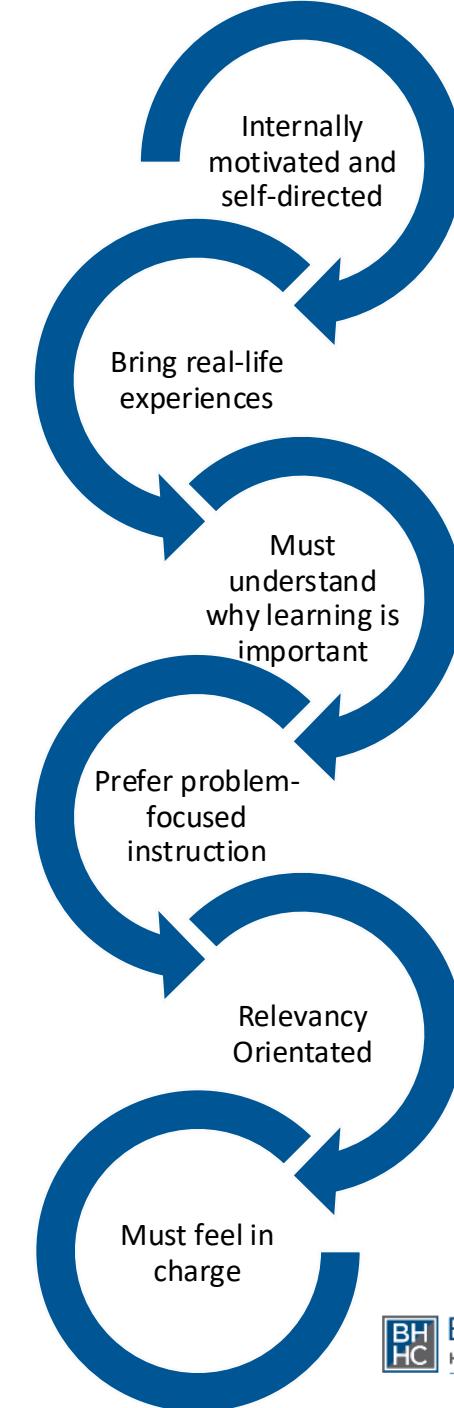
- tailor methods to individual preferences

Blended approaches

- (visual + verbal + hands-on) increase retention and engagement.
- Misalignment between coaching style and learning preference can lead to confusion or disengagement.

Supervisors should observe and adapt

- ask employees how they best absorb information.



Adult  
Learning

# Active Listening



## Safety Communication Techniques for Supervisors

### What makes it successful:

- Shows employees their concerns are heard and valued.
- Builds trust and encourages open dialogue.
- Helps supervisors identify underlying safety issues

# Summary



# ROLE OF SAFETY OBSERVATIONS



## IDENTIFY UNSAFE BEHAVIORS

Observe and recognize risky actions



## REINFORCE SAFE PRACTICES

Encourage adherence to safety procedures



## PROVIDE FEEDBACK

Discuss positive and negative findings



## PREVENT INCIDENTS

Address hazards before they cause harm

# A Safety Observation Commitment

- How many safety observations can you do?
- How many are you willing to commit to?
- Who will you observe first?
- What do you hope to accomplish?
- How will you measure your success?



# AGENDA

## Recap

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  - Prepare To Conduct a Safety Observation
  - The Role of SOP's and JHA's
  - Deciding to Tell or Not to Tell
2. Performing Safety Observation
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# Questions?

Please email additional questions to [losscontrol@bhhc.com](mailto:losscontrol@bhhc.com)