

**ACHIEVING COMPLIANCE THROUGH PEOPLE:
TRAINING SUPERVISORS TO TACKLE PROCEDURAL NON-
COMPLIANCE
REFERENCE 029**

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Abstract

All organisations face the challenge of improving compliance. For many, the challenge is increased by the nature of the workforce, which may be both constantly changing, and working away from a fixed location. In such circumstances, there is significant reliance on local supervision to control the work, and instil the necessary culture and attitudes. For such organisations, it's apparent that the local supervisor is a key element in any compliance enhancement process.

Over the last 2 years Greenstreet Berman has been developing a programme to help a national utility organisation tackle procedural team non-compliance through the effective development of supervisors. The programme has led to the creation of a Supervisor Development Centre. This centre focuses on providing supervisors with the leadership and supervisory skills to ensure they can effectively identify, challenge and rectify team procedural non-compliance while on site and thus improve the overall safety of operations.

The development centre looks at procedural non-compliance relating both to occupational health and safety and to process safety. A key element of the approach is to use picture-based and live mock-up scenarios to help supervisors practice their skills and allow an assessment of competence to take place, which can feed into on-going competence management arrangements.

The overall approach recognises that each supervisor comes not only with different levels of 'compliance management competence', but also with different interpersonal skills and approaches. Consequently the development centre is oriented around enabling participants to understand and recognise their own strengths and limitations, as well as recognising positive and negative behaviours in the staff they are supervising.

This paper discusses the development and implementation of the supervisor development centre. The paper will briefly summarise the background to the development of the centre, detail the methodology used to identify relevant competencies and training requirements, describe the centre aims and content and finally provide some indication of the value of the centre, based on anecdotal participant feedback. It will draw out the implications for any organisation that wishes to enhance compliance.

Keywords: Training, Competence Management, Leadership, Supervision

Introduction

Procedural compliance is an essential element of safety management, in terms of

occupational health and safety and process safety and business management, in terms of improving performance, enhancing reputation and reducing costs (i.e. costs associated with re-work, damage to materials and other assets, and those that can arise from incidents and accidents).

However the effective management of procedural compliance is a significant challenge and organisations need solutions that provide long-term sustainable improvement. To do this, there needs to be a move away from focusing solely on surface issue solutions such as procedural and task re-design and start to consider how an organisation can foster and install positive safety behaviours in their teams. Indeed for this to occur the local supervisor becomes a key element in the enhancement of compliance, as for many organisations, site teams change regularly and work away from a fixed location.

Research indicates that the supervisor plays a crucial role in the management of team safety, a key element of which is procedural compliance¹. Effective supervision has been shown to have a positive and long lasting effect on team performance, compliance, injury rate, delays and costs^{2,3}. This is essentially because supervisors have the greatest opportunity to influence team behaviour, and through their own behaviour, foster and instil the necessary culture and attitudes within their teams.

It is therefore in recognition of the crucial role supervisors play, that Greenstreet Berman Ltd in collaboration with National Grid have developed the Supervisor Development Centre, to help supervisors develop the skills they require to successfully tackle procedural non-compliance through fostering and installing positive safety behaviours in their teams.

Rational for the Supervisor Development Centre

Over the past few years National Grid has been implementing a compliance management improvement program across the organisation to improve the level of compliance with engineering standards and safe working practices. Their key objectives are to:

- Ensure public safety – this includes immediate public safety when carrying out work in areas where members of the public could be affected e.g. signage, lighting and guarding issues;
- Improve process safety – this refers to the quality and integrity of work carried out e.g. pipework is replaced according to procedures to ensure that it has the desired integrity and is not at risk of failure sooner than expected;
- Ensure employee health and safety – risk of injury/death (e.g. slips, trips, falls etc.).

National Grid recognised that supervisors are pivotal in improving standards and compliance as they have direct influence on teams and consequently required a solution to be focused at this level to ensure that supervisors have the necessary skills to effectively lead and manage their teams to ensure team compliance with National Grid engineering standards and safe working practices. Moreover, National Grid required a

¹ HSE (1999) Effective Supervisory Safety Leadership Behaviors in the Offshore Oil and Gas Industry

² Greenstreet Berman (2008) Managing Driver Managers

³ Rail Safety and Standards Board (2009) Understanding Human Factors.

solution that provide sustainable long-lasting results and that would have a observed positive benefits on performance, reputation and cost.

Greenstreet Berman was commissioned by National Grid to provide overall support on the compliance program and to specifically develop the Supervisor Development Centre. This is because Greenstreet Berman has considerable experience of supporting compliance improvement programs and developing safety leadership and behavioural safety training, that provide sustainable safety and business improvements.

Development of the centre

The centre was developed from three approaches – job analysis workshops, training review and stakeholder discussions – along with Greenstreet Berman’s general expertise in safety leadership issues. This triangulation of approaches was applied to ensure the course was built around the specific requirements of National Grid and key competencies required for supervisors to effectively tackle team non-compliance.

Job analysis workshops

Two job analysis workshops were carried out with National Grid supervisors. Each workshop had approximately 8-10 supervisors and lasted a full day. Supervisors were selected from across the organisation to ensure diversity within the sample.

The objectives of the workshops were to:

- Understand the context and current roles of the supervisors;
- Identify supervisor perceptions of their current role and key priorities;
- Identify key tasks and behaviours associated with good and poor performance;
- Identify training already provided – particularly elements identified as being particularly good or poor;
- Identify real and perceived barriers to compliance – both for teams and supervisors.

Training review

A training review was carried out to understand the type of training provided to supervisors and the general structure of the training packages currently being delivered. The review was carried out through discussions with the training department around the types of training provided and a review of several different training packages.

Stakeholder discussions

A number of stakeholder discussions were held with key members of the compliance improvement strategy team. The discussions were used to help identify what National Grid required from the course, that is, what was the perceived success criteria and what type of information was required from the course in terms of assessment of competence. The discussions were also used to help National Grid think about and identify the types of competencies and behaviours they expected from supervisors that could then be integrated into the course.

Findings

The job analysis workshops, training review and stakeholder discussions highlighted a number of key findings:

- The role of the supervisor was revealed as being complex with many differing, and potentially competing priorities. There was an apparent lack of clarity on National Grid's expectation on the key priorities and activities;
- Supervisors recognised safety as a key part of their responsibilities but had received little if any training on safety leadership;
- Three key supervisor competencies were identified for the successful management and enhancement of team non-compliance:
 - Observation – accurate identification and understanding of non-compliance on site;
 - Challenging – confidence and motivation to challenge all non-compliances identified on site, remaining in control of interactions with teams, setting clear expectations of behaviour and ensuring that corrective action is taken to rectify the non-compliance;
 - Coaching – effective questioning and listening to help teams understand and identify for themselves non-compliances, consequences of the non-compliance and required corrective actions.
- Current training combined both presentation and practical elements. Training packages that were highly interactive and practical were considered to be the most successful programs. However the majority of training provided related to technical and process knowledge and practice and not safety leadership and safety management;
- National Grid required a program that firstly helped develop the competence of supervisors but also provided an assessment of performance and competence to aid further development activity once the supervisor had finished the course.

These findings were used to develop and structure the course aims and content.

Aims of the development centre

The key aim of the development centre is to allow supervisors to learn, practice and develop the key competencies needed to effectively tackle and enhance team non-compliance, in a supportive environment where they can receive feedback on their performance from their peers and the facilitators.

Indeed it is for this reason that the training package has been titled a “development centre” as oppose to a training course. This is because a “development centre” is a specific type of training event that uses a package of inputs, exercises and scenarios that simultaneously assess an individual's performance and provide development opportunities to meet a required level of competence.

The specific aims of the centre are to:

- Help supervisors clearly understand their role and responsibilities as supervisors;
- Enhance the supervisor's ability to influence team behaviours to stop non-compliance and thus perform through their teams (through observation, challenging and coaching);
- Allow supervisors to practice these competencies and learn from their peers in a supportive environment;
- Identify on-going development needs.

Structure of the development centre

The development centre is structured into several components – pre-course work, during the centre and post course continuous learning.

Pre-course work

Research indicates that manager feedback and the use of self-reflective questionnaires can help learners identify current strengths and weakness in their style of working and supervision⁴.

Therefore before taking part in the development centre each supervisor is required to complete pre-course work. This consists of completing a leadership impact questionnaire, which takes around 30 minutes. An individual leadership impact report is generated for each supervisor and used within the centre to help supervisors think about their leadership style and its impact on team performance.

The supervisor's line manager is also requested to provide feedback on the supervisor's performance to help the supervisor during the development centre think about areas of strength and weakness and identify relevant development steps to improve performance.

During the centre

The centre lasts 2 ½ days and is structured around the learning cycle, combining both input sessions and practice sessions, with feedback to enhance the learning experience of delegates. This has been shown to be a very effective method for learning and development⁵.

Input sessions – throughout the 2 ½ days a range of input sessions are provided, using power point and group based activities. These sessions last around 20 minutes to an hour depending on topic and cover areas such as:

- Roles and responsibilities of supervisors;
- Coaching for compliance;
- Leadership and safety leadership (structured around the leadership impact report and manager feedback);

⁴ Doyle (2003) Work and Organizational Psychology. An Introduction with Attitude.

- Risk based decision making (using picture based exercises of non-compliance);
- Challenge, interacting and providing feedback (using video clips, pictures of non-compliance, group exercises);
- Risk assessment (key component involves a risk assessment using the PTW for deep excavation);
- Setting standards and influencing people – (particularly focus on why people do not comply, supervisor behaviours that can influence non-compliance and the key opportunities supervisors have to influence their teams);
- Time management;
- HSE responsibilities- based around a video interview of a supervisor who was involved in an HSE investigation.

Picture based scenarios – the picture based scenarios are a key component of the development centre and allow the supervisor to practice the required competencies within a realistic setting.

For each picture based scenario session (initial site inspection, return site inspection, team brief and individual coaching) supervisors are split into two groups of four, with one facilitator per group. Within each group an individual will be selected to play the role of the supervisor for the scenario, two other group members will be selected to play the team and one group member will be required to play the observer. The individual playing the supervisor is given some pictures of non-compliance that represents the team's job. The supervisor and team are required to act as though they are on-site. The supervisor is required to rectify the situation and the individuals playing the team are provided with role play instructions and encouraged to be challenging. The scenario usually runs for about 5-10 minutes until the situation is resolved or reaches a natural conclusion.

During the scenario the facilitator observes the supervisor's behaviour and uses a set of detailed observation criteria to help make notes on key behaviours exhibited by the supervisor during the scenario.

Once the scenario has finished each group member provides feedback on the supervisor's performance, highlighting strengths and development areas. The facilitator then provides feedback based on their observations.

The whole process is then repeated using different pictures until all members of the group have played the role of the supervisor.

Each picture based scenario session increases with difficulty as the centre continues, i.e. for each session supervisors are expected to apply more sophisticated behaviours to help tackle the problem. This therefore allows supervisors to apply skills and increase competence as the centre progresses.

Live mock-ups – the development centre is run at the National Grid Skills Development Centre in Hitchin which has the facility to run live mock-ups of deep

⁵ Buckley and Caple (2004) The Theory and Practice of Training.

excavations, service connections and street walkthroughs. Live mock-ups are therefore used within the centre to provide a further opportunity for supervisors to practice skills and receive feedback on performance.

Six live mock-up sessions are carried out within the centre:

- Two deep excavation sessions with non-compliances relating to trench support, PPE and PTW;
- Two service connections with non compliances relating to pipe integrity;
- Two initial site briefing walkthroughs.

The live mock up sessions are structured exactly the same as the picture based scenario sessions but use real-live mock-ups to make the situation as real as possible. This has proven to be very useful in providing a more testing challenge, particularly on observation skills, than the picture based scenarios. Additionally, the supervisors like the more realistic site situation.

Post course continuous learning

Research indicates that learning and development interventions often fail to produce long term benefits because organisations do not implement effective processes and systems to support continuous learning and development^{6,7}.

Therefore after the development centre a development needs report is developed for each supervisor who has attended the centre. This report collates the facilitator's observations of the supervisor's performance and behaviour during the course, particularly within the scenarios.

The report is broken down into 5 sections:

Demonstration of the key competencies - for each of the key competencies (observation, challenging and coaching) a performance rating is given (well above minimum, satisfactory or needs improvement), along with information on strengths, development areas and recommended actions to help enhance performance on that key competence.

Leadership style – the leadership impact report is summarised to help the line manager and supervisor clearly understand the supervisor's leadership style and the impact, both positive and negative, the style can have on team performance.

Attitude on course - a summary is provided of the supervisor's attitude on the course, whether they engaged with the material, were keen to learn, etc, thus providing an indication of their aptitude for learning and willingness or resistance to change.

Overall comment – an overall comment is provided for the supervisor based on all observations during the course. This essentially summarises the previous sections, particularly their observed level of competence demonstrated on the course and their attitude

Mentoring activities – a list of relevant mentoring activities is provided based on the

⁶ Doyle (2003) Work and Organizational Psychology. An Introduction with Attitude.

⁷ Buckley and Caple (2004) The Theory and Practice of Training.

observations of performance, identified development needs and recommended actions to improve performance. The aim of this section is to provide the supervisor's manager with ideas and guidance on how they can help the supervisor continue to develop and improve once they are back in the workplace.

The key aim of the report is to facilitate and help the manager and supervisor identify and implement mentoring and development activities to ensure the supervisor can continue to learn, develop and improve. Moreover, information within the report is only based on observations during the centre and hence the managers are encouraged to use the reports in conjunction with other relevant performance data to help identify development and mentoring activities.

Reported benefits

The supervisor development centre has been running since September 2008 (progressively improving as time passes) and is now a key component of the National Grid compliance improvement program, providing a unique and powerful way of helping to improve procedural compliance. The development centre does this by providing supervisors with the opportunity to acquire, practice and apply the skills and behaviours needed to positively influence teams understanding of, and behaviour to, procedural compliance.

Feedback from participants of the centre has been overwhelmingly very positive. Participants have felt that the centre provides the key skills needed to help tackle team non-compliance and allows supervisors to not only practice these skills in realistic situations but also learn from their peers and learn how other supervisors tackle situations, thus helping to give supervisors greater confidence in interacting and dealing with teams who are not complying with National Grid engineering standards and safe working practices.

Indeed Greenstreet Berman Ltd recently assisted a National Grid Alliance in identifying and evaluating the impact of the Supervisor Development Centre. The review has currently identified the following key business impacts:

- Supervisors have increased confidence in their role;
- Supervisors are stopping unsafe jobs more often because they are not only more confident of when they should stop a job but more confident that they will be supported in doing so;
- Improved compliance across Occupational Health and Safety and Process Safety measures and belief that the course will help to sustain this improvement;
- Application of a standardised approach to supervision of teams across the alliance.

The above business impacts are all enablers to improved safety performance and reductions in accidents and incidents, thus highlighting the potential impact the supervisor development centre can have on bottom line business and safety results.

Application of approach

The Supervisor Development Centre can be applied to any high hazard operational environment where operations are carried out by teams and require supervision. Moreover, this work demonstrates supervisors play a critical role in facilitating long-lasting improvements in compliance and other relevant business areas and therefore any organisation looking to improve procedural compliance would benefit from interventions that aim to help supervisors practice and develop the necessary skills to foster and install positive team behaviors.

Indeed the approach and structure of the development centre highlights several key learning points, that should be considered by organisations wishing to develop these type of interventions:

1. Structuring the intervention around the key skills and knowledge expected of supervisors to foster positive safety behaviors, identified through job analysis workshops, is essential for ensuring the intervention has maximum affect;
2. Pre-course feedback and assessments are very effective methods for helping supervisors consider strengths and weakness of their supervision style;
3. Interventions should be built around the learning cycle, providing opportunities for theory, practice and feedback, helping to cement learning into practice;
4. Use of picture based scenarios and where possible live mock-ups, allow the supervisor to practice the required competencies within a realistic setting and provide a very effective approach to learning and development, through practice, feedback and peer learning;
5. Systems for continuous learning should be in place to ensure development and improvement continues. Providing development reports after a training intervention can help facilitate this process and provide the foundations for continued development.