

# 2019-05 - Clarification On The HSE Minimum Requirements

Hello Everyone,

I was talking with an HSE Manager from one of our sites and he brought up a very important point. As his site was implementing the life saving rules, he felt that in some cases we were removing responsibility from our employees by what we were requiring. When he mentioned this to me, I was somewhat surprised as that was not our intent and was contrary to the culture we want to create within Solvay. In particular, he referenced the requirement, in the SLSR Work at Height, that scaffolds must be inspected daily by a qualified person.

We intentionally left this a little vague (i.e. did not define who could be a qualified person) because we knew different sites managed this differently (e.g. some used a person from a scaffold company (if they were permanently on their site), others trained their operators and maintenance staff to inspect the scaffold before using it, others used a member of their HSE team, etc.). In this particular case, his site's normal way of working was to have the user inspect the scaffold before use; however, the rule was interpreted as requiring that the daily inspection be done by a person with the same qualifications as the person who certifies the scaffold after it is constructed (in their case, someone from the scaffold company). As a result, it created some frustration because: (1) it cost additional time and money (without an improvement in HSE) and (2) it removed some ownership from the user. However, in reality, their current practice was perfectly in line with the intent of the procedure.

I wanted to share this example (there have been a couple of other ones like this) with you to let you know:

- (1) If you think we are asking you to do something does not make sense or is a significant burden, please let us know and we will discuss;
- (2) Don't forget to look in the guidelines or FAQ for clarification (the answer you need may be there); and

(3) The procedures are structured so that each line is a requirement. The "Notes" are typically a clarification, recommendation, or example – Notes are Not Requirements. The "Warnings" are there to remind you that if you do not implement the requirement (that the Warning references), the consequences could be serious. Warnings are not Requirements.

In the end, there are some things in the procedures that must be done and there is not much flexibility (e.g. if you are working on a roof, the roof either needs to be certified to handle the weight or you must have a safety watch 100% of the time). However, there are other parts of the rules where there is flexibility (like the example above). This was on purpose to let you decide what works best for your site.

I was reading through "Mind Your Own Business" by Andrew Sharman and he reflects on this very point: *.....some of the time.....there are rules and requirements that must be followed. But, there will also be times when .....there is much less prescription than you might think. The freedom to do it your way often does really exist. It is essential that you make your personal mark on the approach.....because the people who work there ....can sense when safety really matters and their bosses really care as opposed to being done.....because the law or experts say it must be.*

Be Safe,

James