

# Compliance Matters

## The Near Miss — Helping to Maintain Safety

By Bob Yeoman, B&R Compliance



In *Compliance Matters*, Bob Yeoman, President and CEO of B&R Compliance Associates LLC, examines the broad range of compliance management issues affecting companies in the industrial and medical gas industry. Here you'll find insight and information on FDA issues, for which B&R Compliance is well-known, as well as other regulatory management issues affecting readers of *CryoGas International*, including those relating to safety, the environment, transportation, and security.

In my last article, I discussed how keeping employees aware of workplace hazards is a key element of accident prevention. As employees' awareness lessens over time, firms with successful safety programs rely on internal processes to identify and alert them when this diminished attention to hazards occurs. One of the more effective tools in the safety manager's arsenal for monitoring employee hazard recognition is the "near miss" accident report. This article examines how this often misunderstood tool can help companies achieve the next level of safety performance. It also reviews some of the pitfalls to avoid when implementing a near miss incident reporting program.

### THE NEAR MISS

What constitutes a near miss accident? Most companies define a near miss incident as any event which, under slightly different circumstances, would have resulted in damage or injury to personnel, equipment, or facilities. In other words, it is an incident in which there were no injuries or damage to plant equipment or the facility, but the potential was there. For example, if an employee is walking through your plant and something falls from an overhead scaffold landing in front of him rather than on him, this is a near miss incident. Under the same scenario, however, if the object falls from the scaffold and hits the employee on his hard hat, this is classified as a reportable accident even if no injury was incurred.

Near miss incidents do not count against a firm's OSHA safety record but reportable accidents do. For this reason, we find there is

pressure from operations managers to move minor-type accidents out of the reportable category and into the near miss system. It is also our experience that many managers do not understand what constitutes a near miss incident vs. a reportable accident — it is a rather fine line. In both cases, no one was injured. This generates inconsistency in reporting these issues. We recommend that, at the very least, a member of your organization with the appropriate safety knowledge and training be appointed arbiter of reportable vs. near miss incidents. You can also have your company's safety committee fill this role. This process helps ensure incidents are classified consistently and maintains the integrity of your safety record.

### SERIOUS ACCIDENTS

Serious or fatal accidents rarely occur the first time a hazard is introduced to an organization. Experienced accident investigators often find preexisting conditions that were potential hazards just waiting to become accidents. Unfortunately for many companies, these indicators only become evident in hindsight. An accident I investigated recently is a good example of this principle. At a cylinder fill facility, a crack in the loading dock area developed into a tripping hazard, probably due to a frost heave in the dock's concrete surface. Although all of the employees who worked on the dock were aware of the issue, no one thought it important enough to report to management. Almost three months after the crack had developed, a loading dock employee carrying boxes while talking to a customer on his hands-free cell phone tripped

on the crack, fell, and seriously injured his knee, requiring surgical repair. The employee could not work for the next 2 ½ months, and the facility ended nearly 10 years of a perfect safety record.

All the employees we interviewed who worked in and around the accident area admitted to being aware of the tripping hazard. In fact, every one of them reported having tripped over the crack themselves a number of times. However, no one filed a formal report of either the unsafe condition (the crack) or their near miss event of having tripped over the crack. By our reckoning, there were literally dozens of missed opportunities over a three month period to address this unsafe situation and fix it, thereby preventing a serious accident.

### THE POWER OF A NEAR MISS SAFETY MONITORING PROGRAM

From this example, you can appreciate the power a near miss reporting program. The ability to stay ahead of potential problems and to fix hazards before they result in accidents and employee injuries is critical to transforming a good safety program into a great one. A well-utilized near miss incident reporting system has the capability of moving a company's safety record from middle-of-the-pack to a leadership position. Within our industry, Air Liquide is harnessing the power of this process. I discussed the importance of near miss reporting with Ms. Susan Amodeo Cathey, the Director of Health, Safety, Environment, & Security for Air Liquide in the US. Amodeo Cathey reports:

*"A key element in the continuous and significant improvements Air Liquide has made to our safety performance over the last few years has been our near miss incident reporting and investigation process. Our management team is strongly committed to this program, and their support and active involvement is critical to making this process work. In addition to having an effective system to report near miss*

incidents, Air Liquide also has a process to take this information and transform it into action. We have a whole suite of tools to help us to investigate these incidents and to understand their root causes. To us, understanding what needs to be fixed to prevent a re-occurrence of a potential problem is vital. The final step in our process is to close the loop by implementing an appropriate set of corrective actions, and communicating what we have done to our employees. Air Liquide is committed to finding and fixing potential problems before they ever have the chance to become an accident or injury.”

### THE STIGMA PROBLEM

Unfortunately, there is a stigma attached to near miss incident reporting; this seems to be part of human nature. Have you ever tripped and not felt embarrassed? People are reluctant to admit that they did something that may be perceived as “dumb.” In the loading dock example, the employees we interviewed all remarked that the reason they had not reported tripping over the crack was mainly to avoid the embarrassment of having to

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**How companies manage near miss reports is key to creating a lasting program.**

report this to their boss. They associated tripping with their own clumsiness, not the result of exposure to a work place hazard that needed repair.

These types of attitudes can impact the long-term survivability of a near miss program. Many near miss reporting programs start out strong, but as time progresses the number of reports slowly declines and the program fades away. How companies manage near miss reports is key to creating a lasting program. All too frequently, a company simply sends copies of near miss incident reports around the firm in a well-intentioned effort to educate employees on existing hazards. This attempt at a reporting program actually backfires by compounding the employees’ embarrassment; the employees are faced with the prospect of virtually everyone in the company seeing their near miss reports. Under these conditions, employees tend to report only incidents they think they must and

avoid reporting those they believe they can keep quiet. Creating a process that depersonalizes near miss reports and still communicates the lessons that can be learned from them is critical to the survival of a near miss reporting program.

### THE BENEFITS OF NEAR MISS MONITORING

Probably the most common mistake firms make when implementing a near miss reporting program is failing to take action to correct reported issues as they are identified. No matter how much hoopla surrounds the program, or how motivated to report incidents employees may be, if management takes no action to correct or eliminate potential work place hazards, employees quickly turn the program off and near miss reports dry up. For this reason, many firms look for issues that can easily be resolved early in the program and communicate their successes to the entire organization. This demonstrates the

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firm's commitment to the process and encourages the long-term utility of the near miss monitoring program

One of the biggest benefits to implementing a near miss accident reporting program is that it provides an early warning to managers about potential workplace hazards and their causes. For example, if you suddenly have two or three similar types of near misses reported, that may indicate it is time to perform some employee re-training. A cluster of near miss reports can also signal that employees are taking procedural short cuts, or that a new piece of equipment or recent repair has introduced a new hazard to the workplace. If near miss reporting drops off, it alerts managers to the fact that employees are becoming less aware, or more used to, hazards. In each instance, having this program in place equips you with information to deal with potential problems before they cause injuries or financial pain to your organization.

Near miss reporting programs take a lot of effort to get started. There is usually significant reluctance on the part of the workforce, due to embarrassment as discussed earlier. Overcoming this resistance is a challenge. It requires a visible display of management support and the willingness not to punish those who report near misses. The benefits of near miss reporting systems can bring a company's safety program to the next level. Once started, these programs usually become self-sustaining as long as management support exists. We have only scratched the surface of implementing a near miss reporting program in this article. To learn more, please give us a call.

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