

CHAPTER A.6 — FOSTERING AN OPERATIONAL INTEGRITY MANAGEMENT CULTURE

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OPERATIONAL INTEGRITY MANAGEMENT

This is the sixth chapter in the first volume of a series of books on the topic of Operational Integrity Management. The Table below provides a list of current books and chapters (the current chapter is highlighted).

The first volume in this series provides an overview of operational integrity management (OIM): what it is, how it works, and what it achieves. The first volume also provides an overview of the industries to which operational integrity management techniques are usually used. The second volume consists of sixteen chapters, one for each of the elements in a representative operational integrity management program. Each chapter also describes how the individual elements can be integrated with one another. The third volume describes the principles of risk management, and also provides guidance to do with the development and management of occupational integrity programs. The fourth volume discusses regulations, industrial standards, and legal issues. The fifth and final volume pulls together the materials in the first four volumes. It shows how operational integrity management systems can be designed, implemented, and audited and how operational integrity can be integrated into projects. The fifth volume concludes with a chapter that describes the roles and activities of the operational integrity management professional.

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INTRODUCTION

This chapter discusses the concept of an ‘Operational Integrity Management (OIM)’ culture, and describes some of the actions that can be taken to engender such a culture. Unfortunately, the word ‘culture’ is very difficult to define — even though most people believe that they recognize when they see it. A dictionary definition of ‘culture’ is:

The predominating attitudes and behavior that characterize the functioning of a group or organization.

The key word in the above definition is ‘functioning’ — culture is about what people actually *do*, not what they *say* they do, nor is it about what they *plan* to do.

It could be argued that there really is no such thing as an ‘organizational culture’. Any organization is made up of individuals, each of whom has knowledge, attitudes and beliefs. It is this sum of individuals that makes up the culture. As Trevor Kletz has said, ‘Organizations don’t have memory — only people do’. Nevertheless, as noted in the first paragraph of Table A.6.1, organizations with a strong culture can, to some extent, cause people to change to conform to that culture.

Many of the concepts and ideas introduced in this chapter are developed further in [Chapter B.1 — Participation, Leadership and Third Parties](#).

Some of the issues and attributes that define culture, particularly an operational integrity management culture, are described below in Table A.6.1.

Table A.6.1 Cultural Attributes

1. Culture is a feature of the entire organization, not just of some of the individuals within that organization. Therefore, if someone — even the chief executive — leaves the organization, the culture of that organization should not change significantly.
2. Culture is on-going — it is not a one-time event. A facility in which everyone is continuously striving to identify and correct problems and to eliminate hazardous conditions has a strong operational integrity culture, whereas a facility which makes only spasmodic and irregular efforts to improve such conditions does not. The ongoing nature of a strong culture is also expressed through an avoidance of a ‘fad of the month mentality’ in which new concepts and systems are constantly being introduced, while earlier initiatives are left to wither.
3. In a strong OIM culture there is minimal disconnect between words and actions. All managers and workers ‘walk the talk’; their words and deeds match.
4. The creation and maintenance of an organizational culture requires leadership from the top. Merely allowing lower level employees to “do their own thing” is not creating a culture.
5. It is difficult for any organization to truly assess the quality of its own culture; people learn to live with situations that really ought to be addressed. It takes an outsider to truly evaluate the quality of a company’s culture. Therefore an organization with a strong OIM culture will make frequent use of outside auditors, inspectors and reviewers to identify areas of weakness and to suggest corrective actions. Moreover, the auditors’ reports will go directly to the facility managers (*see* ‘Warning Flag 6 — Ineffective Audit Process’ on page A.6.18).
6. A strong OIM culture is one in which employees and contract workers feel free to report on difficulties and problems, even if those employees and workers are potentially opening themselves up to criticism by so doing.
7. With regard to HSE (Health, Safety and Environmental) issues, the organization does not place excessive emphasis on the safety term, to the detriment of the health and environmental elements.
8. A strong operational integrity management culture adapts to new circumstances without its basic values being affected by issues such as economic downturns or the adoption of new technologies.

It is suggested here that management can go about creating a strong operational integrity culture by following the three steps shown below.

1. Prepare and publish a Mission Statement that spells out the organization's stated commitment to operational integrity management principles.
2. Develop guiding tenets that show how the OIM program is to be implemented.
3. Develop a detailed program showing how the guiding tenets are to be achieved.

These three steps are discussed below.

Company Mission Statement

Many companies, particularly large corporations, will publish a Mission Statement that includes an explicit commitment to operational integrity values and programs. Mission statements are a high level expression of the culture that management wishes to foster. Table A.6.2 is an example of such a statement for an operational integrity management program.

Table A.6.2 Representative Mission Statement

Our mission is to be a leader in our industry for operational integrity performance. In order to achieve this we will:

1. Create a culture throughout our organization where the importance of personal health, safety and environmental ethics and decision making is clearly understood at all levels, both among employees and contract workers.
2. Create a business environment in which our emphasis is on the prevention of incidents and releases that could endanger our employees, our contract workers, the public, the environment, or our facilities.
3. Develop cost-effective solutions to Health, Safety and Environmental (HSE) challenges.
4. Include the HSE performance of contractors in our contractor selection process, and require all contractors to conduct their work in a healthy, safe and environmentally sound manner.
5. Maintain the highest ethical standards in our relations with host governments, communities, regulators, and the media by promoting open and honest communications, integrity and accountability.
6. Retain highly qualified professionals at all levels in the organization (both employees and contractors).

It is relatively easy to write and publish a mission statement ? it is much more difficult to maintain a commitment to the mission statement's values, week after week, month