



Managing Rule Breaking

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Shell International Exploration and Production



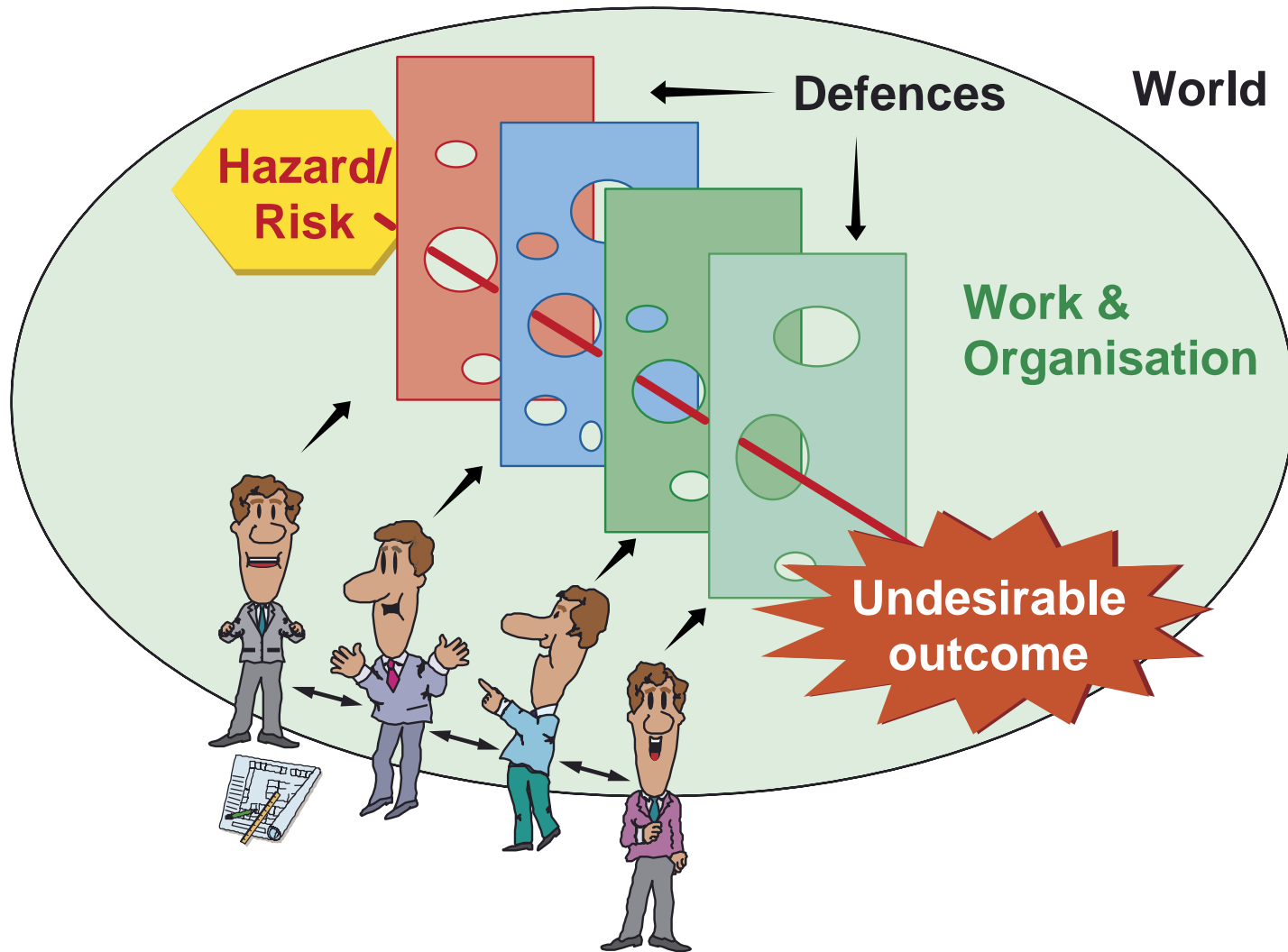








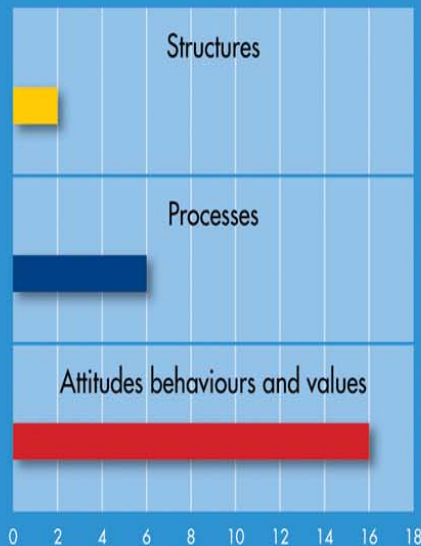
Swiss Cheese Model of Risk Management



Understanding Incidents

We need to address Behaviours, Values and Beliefs
Historically we have not

1999 Root Causes

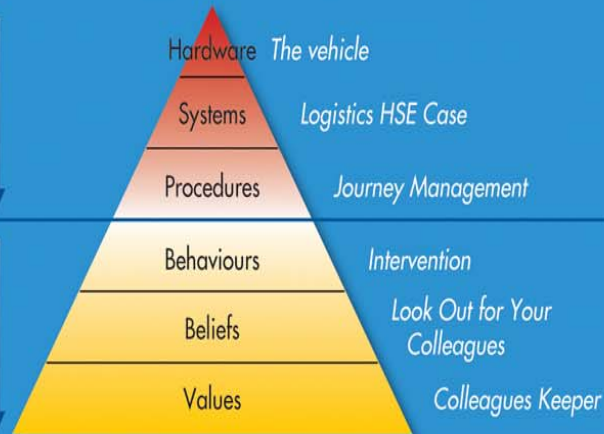


Near miss reports, incident investigations, audits etc.

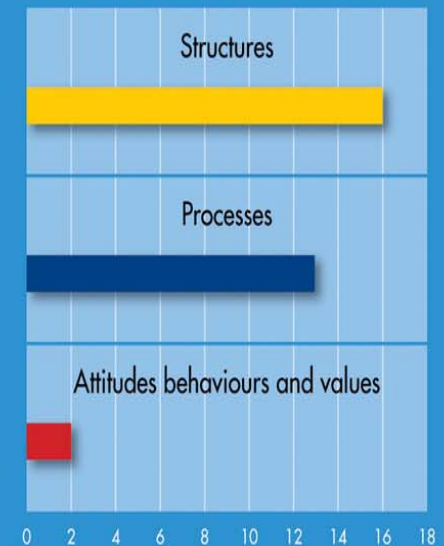
Translation into actions

If problem – we used to appeal in these areas

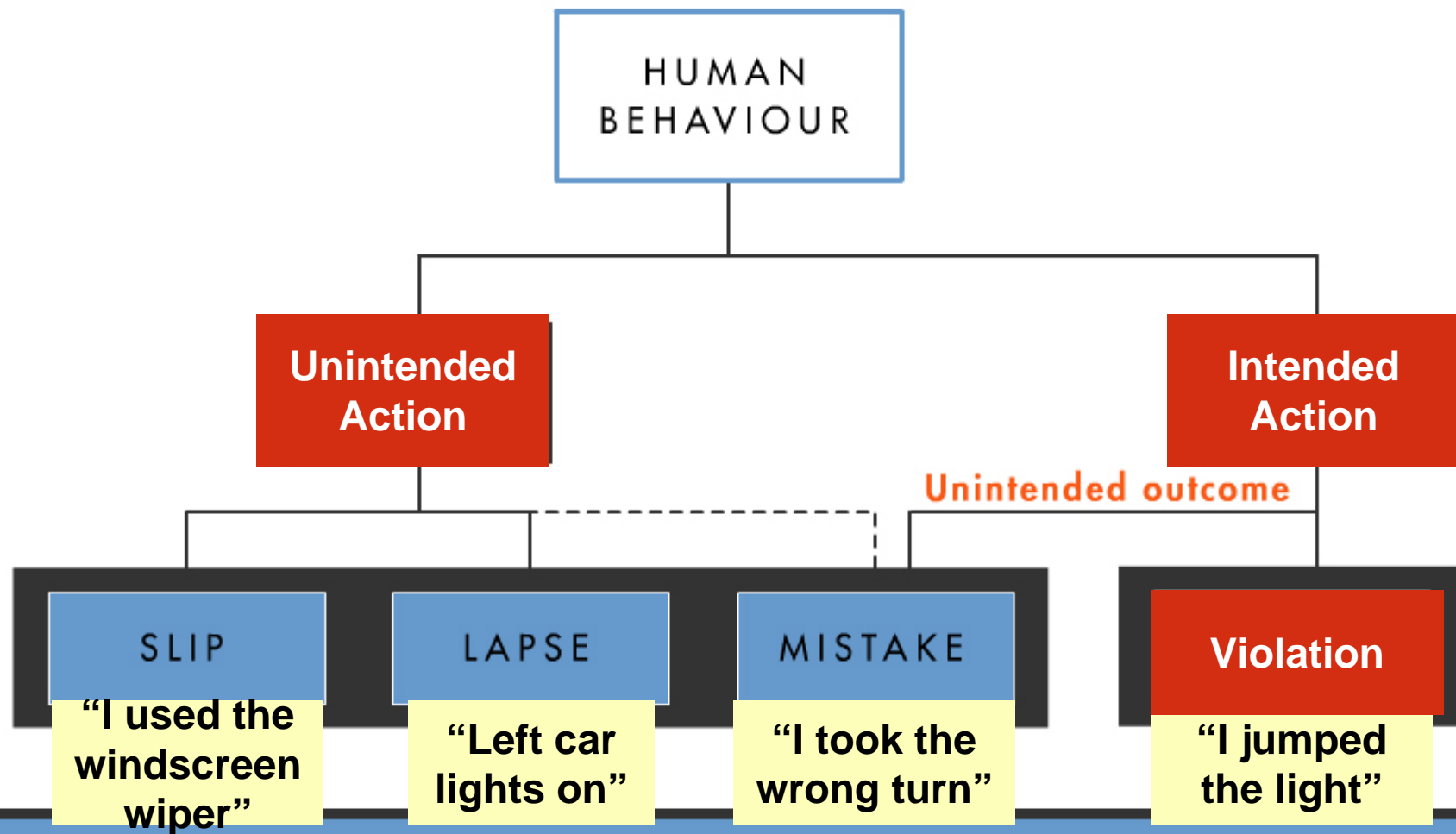
We now need to appeal in these areas



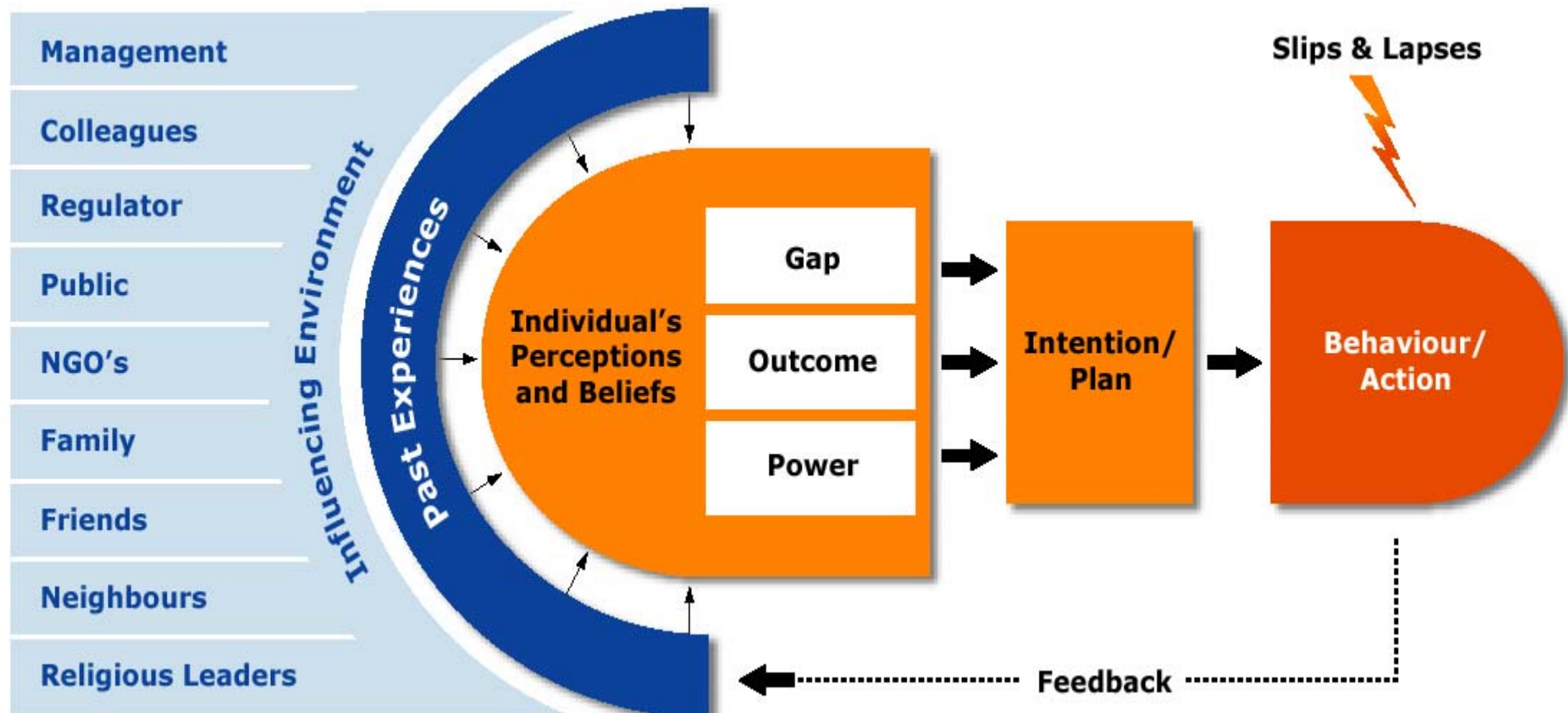
1999 Actions Generated



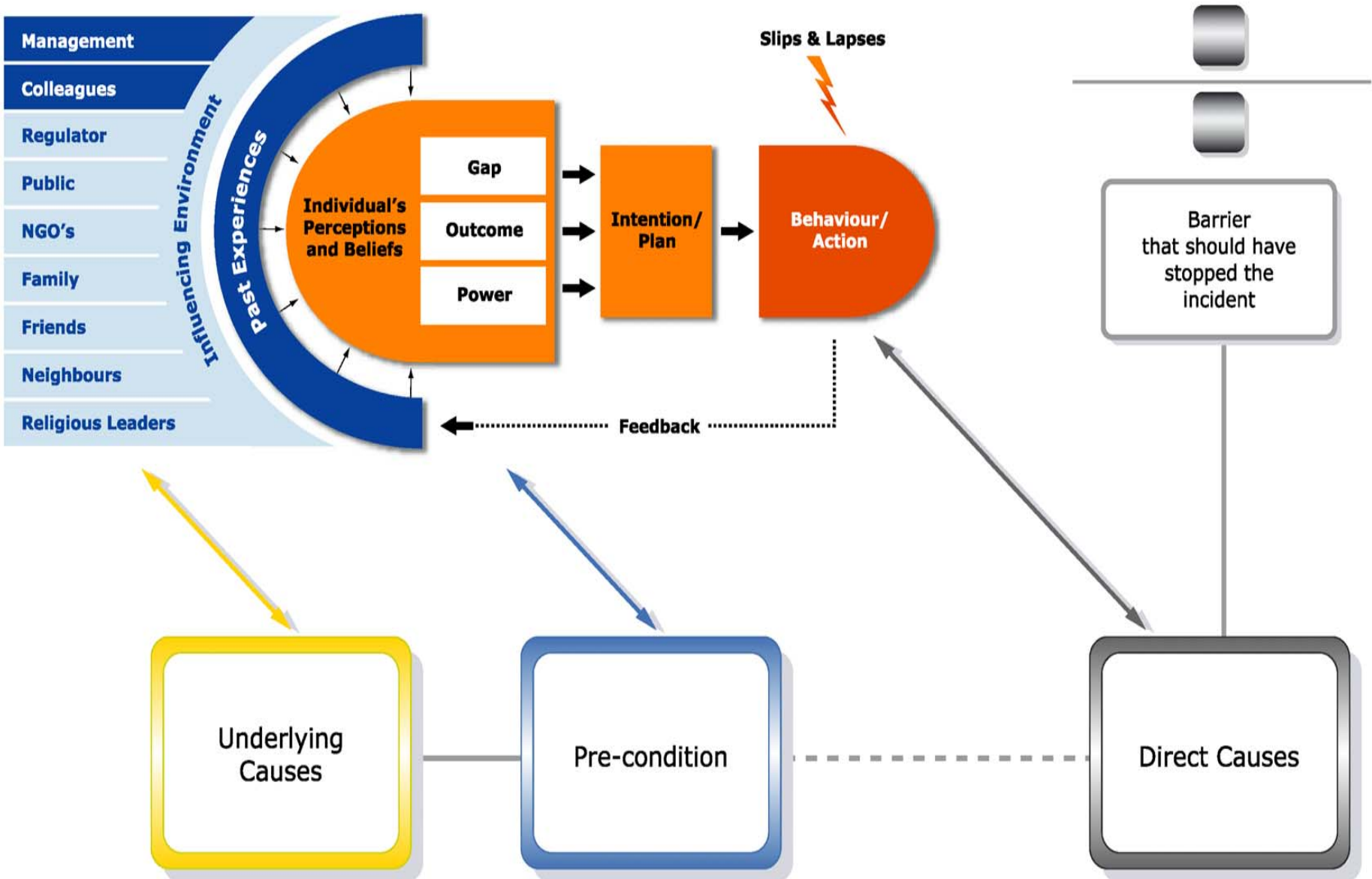
Human errors and violations

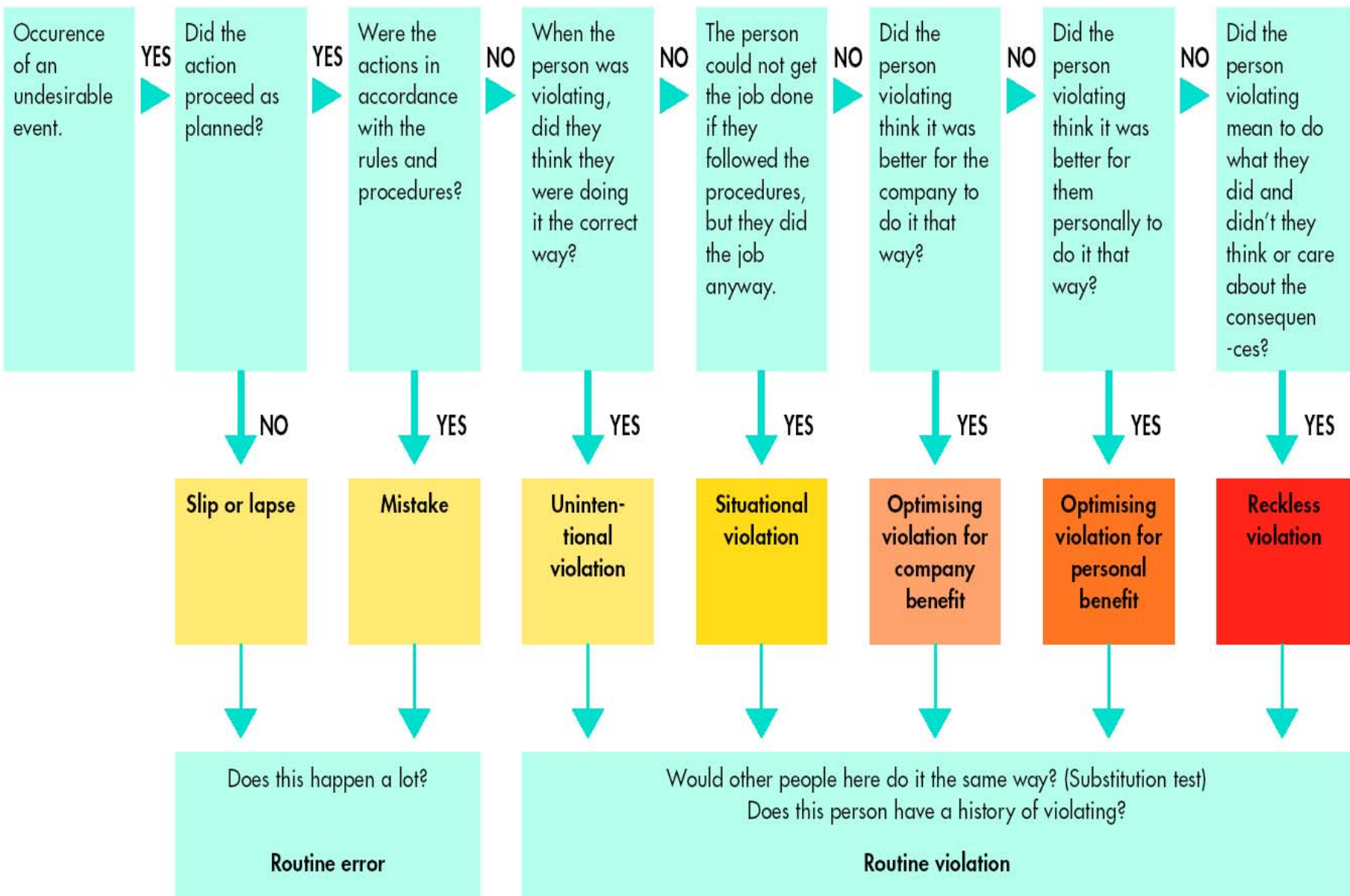


Human Behaviour Model



Human Behaviour and Incident Investigation

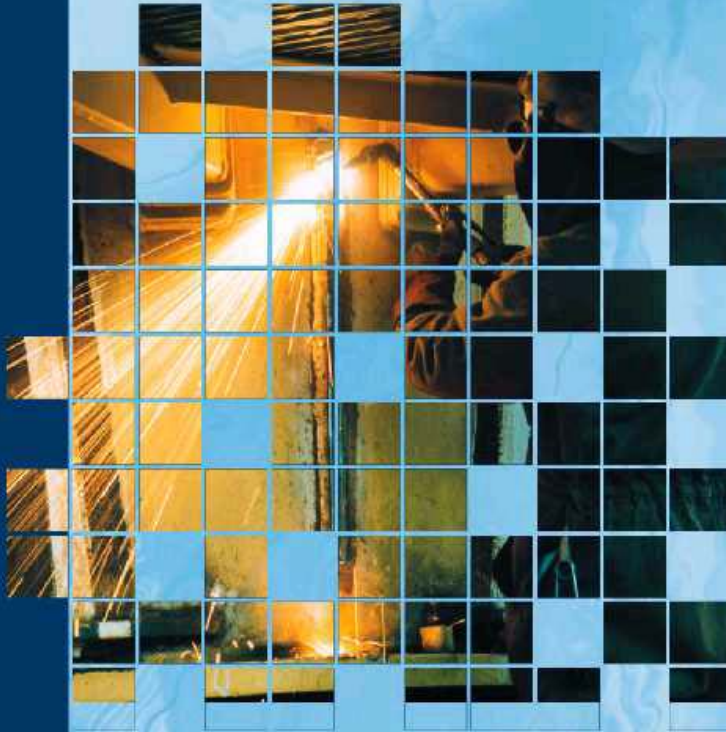




Human Error and Violation Decision Flow Chart



The Proactive Approach



Managing Rule-Breaking *The Toolkit*

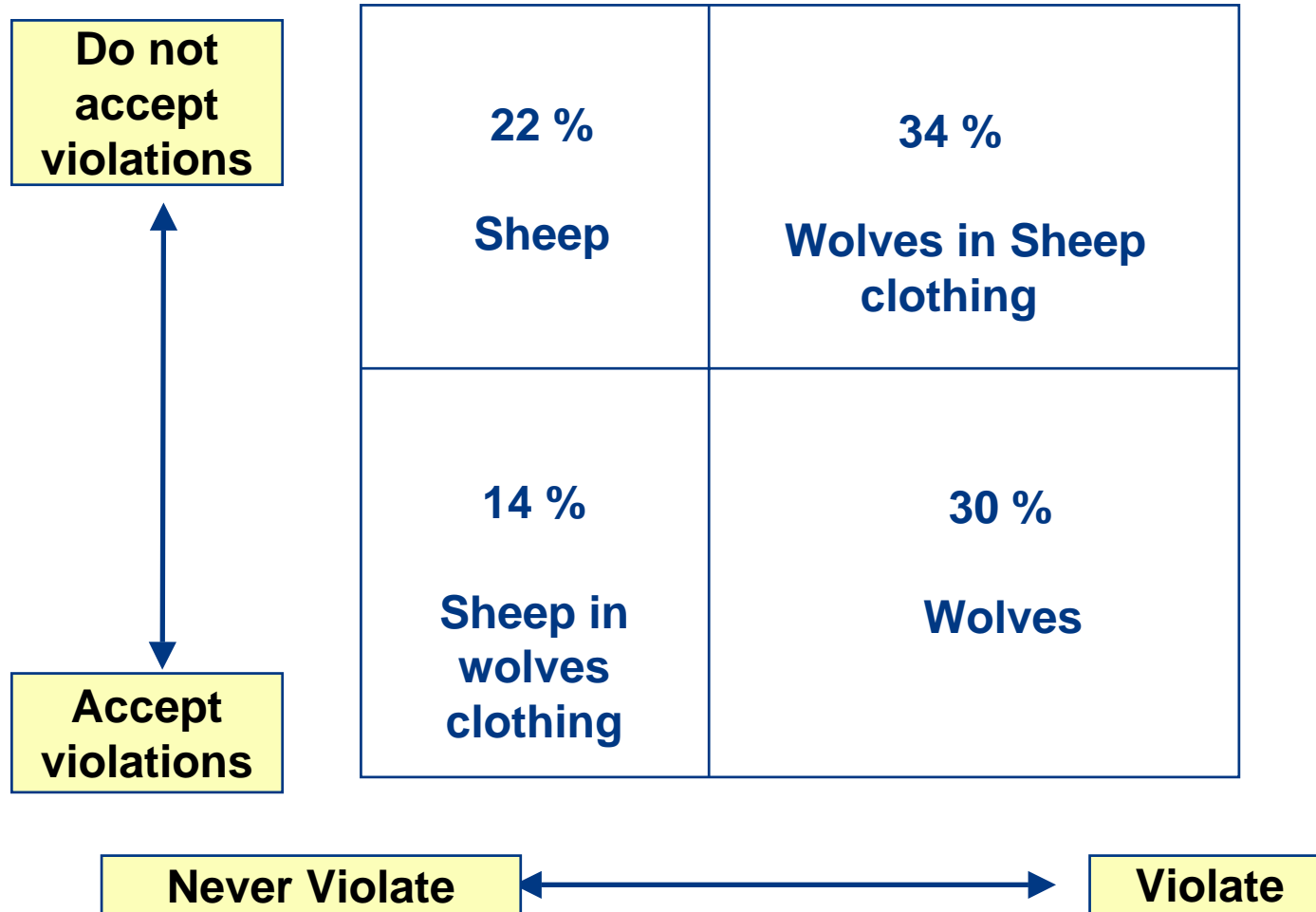


Why are Violations so Dangerous?

- Violators assume everyone else is following the rules and procedures
- Violations are forbidden, so violators don't tell anyone what they are doing
- Errors (slips, lapses, mistakes) are independent of intention – Part of being human!

**VIOLATION + ERROR
= DISASTER**

Results of questionnaires



Procedures and Practices Questionnaire



Please scratch the circle that best reflects your level of agreement with the statement



- 1 The rules are written in language that is easy to understand
- 2 Most procedures are very easy to understand
- 3 Some procedures are very complicated, so I do not understand what I am required to do
- 4 Procedures are usually written without cross-references to other procedures
- 5 Some procedures are factually incorrect

Strongly disagree	Disagree	Neutral	Agree	Strongly agree

15

- 6 There is no system to check that people understand procedures before they are used
- 7 It is easy to get a printed copy of rules and procedures
- 8 I sometimes come across a procedure I did not know existed
- 9 I usually know which rules or procedures to apply
- 10 I only have to know about procedures for tasks I have to do

Strongly disagree	Disagree	Neutral	Agree	Strongly agree

15

- 11 The procedures do not always describe the best way of doing the work
- 12 Most of the procedures make the job safer and more efficient
- 13 Some rules are broken regularly
- 14 I find that the best way to do my job is written in the procedures
- 15 Short cuts are not acceptable, even when they involve little or no risk
- 16 I can get the job done quicker by ignoring some rules
- 17 The rules apply to experienced as well as inexperienced workers
- 18 Most rules do not need to be followed to get the job done safely
- 19 Supervisors are insensitive to some violations of rules
- 20 Some rules are just there to provide cover for management

Strongly disagree	Disagree	Neutral	Agree	Strongly agree

30

SCORING PROCEDURES

- 1 Scratch the circle in the column that reflects your level of agreement/disagreement with each statement
- 2 Add up the numbers scratched open in each group of items and put the sum in the box
- 3 If the sum is less than the critical value given in the coloured box, you are more likely to have a problem

EPT-H2E, June 2001

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Questionnaire

Read the questions and assess which response aligns best with your **personal** work environment.

Aggregated Data Rule-Breaking



1.00

2.00

3.00

4.00

5.00

Expectation

Planning

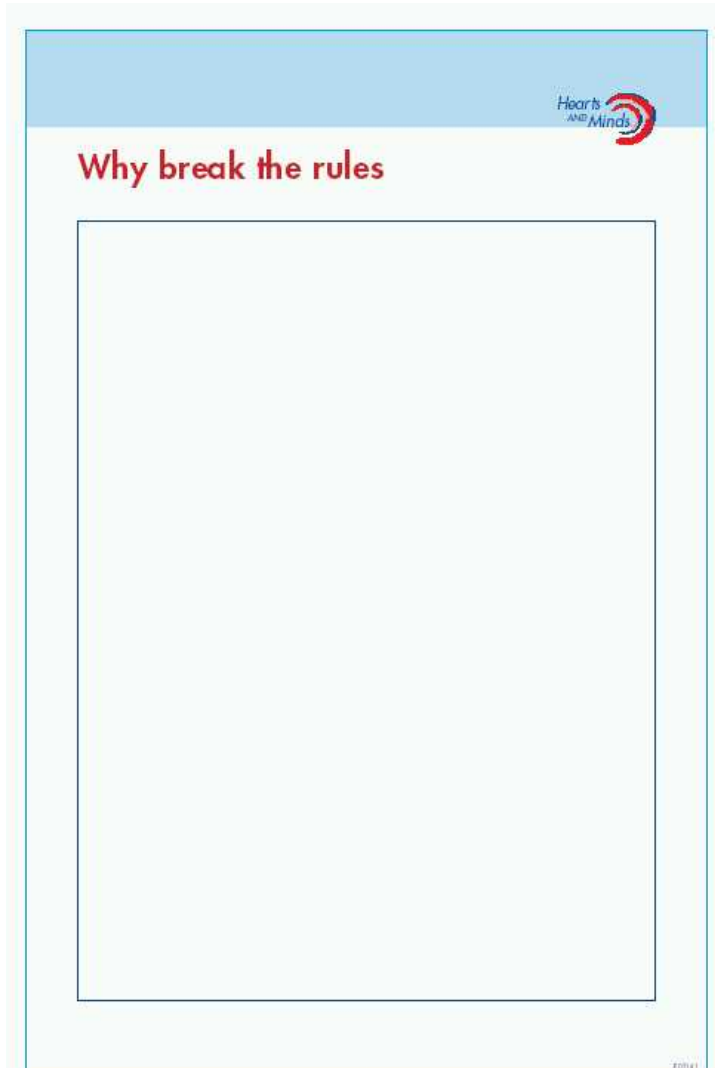
Opportunity

Powerfulness

Personal Norms

Wolves and Sheep

Why do people not follow the rules?



- Jointly in tables (10 minutes)
 - Discuss why you and others break the rules.
 - Write them down on a flip chart - everybody to submit at least one
- **There is no right or wrong answer !!**

Types of violation

Unintentional - Rules are incorrect, unclear, burdensome **or** rules are OK but distribution and training is at fault

Routine - It has become the normal way of doing things

Situational - Cannot do the job without breaking the rules.

Optimising - To please the boss or its more convenient/fun!

Procedures and Practices Questionnaire



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Read the questions and assess which response aligns best with your **personal** work environment.

Aggregated Data Rule-Breaking Scores



1.00

2.00

3.00

4.00

5.00

Unintentional Rule -
Complexity

Unintentional Rule -
Availability

Routine violations

Situational violations

Optimising violations

Exceptional violations

Types of Rule-Breaking: An Unintentional Violation

PR 1508 LIFTING TUBULARS

The slings should be doubled wrapped with a choke hitch taking care not to cross over the sling on the underside of the pipe or pipe bundle. The choke hitch should be pulled tight to secure the bundle and a bulldog grip fitted. A tie wrap should then be fitted to prevent the reeving eye slipping over the bulldog. The included angle between the choke hitches shall not exceed 120 degrees.

Do we need this procedure?

Procedure

Hazards managed by procedure

YES (Arguments)

NO (Arguments)

Possible Solutions

Solutions chosen

Ensuring compliance

A Balanced Approach

Managing Rule Breaking

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graph BT; R[REACTIVE] --> M[Managing Rule Breaking]; P[PROACTIVE] --> M;
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REACTIVE

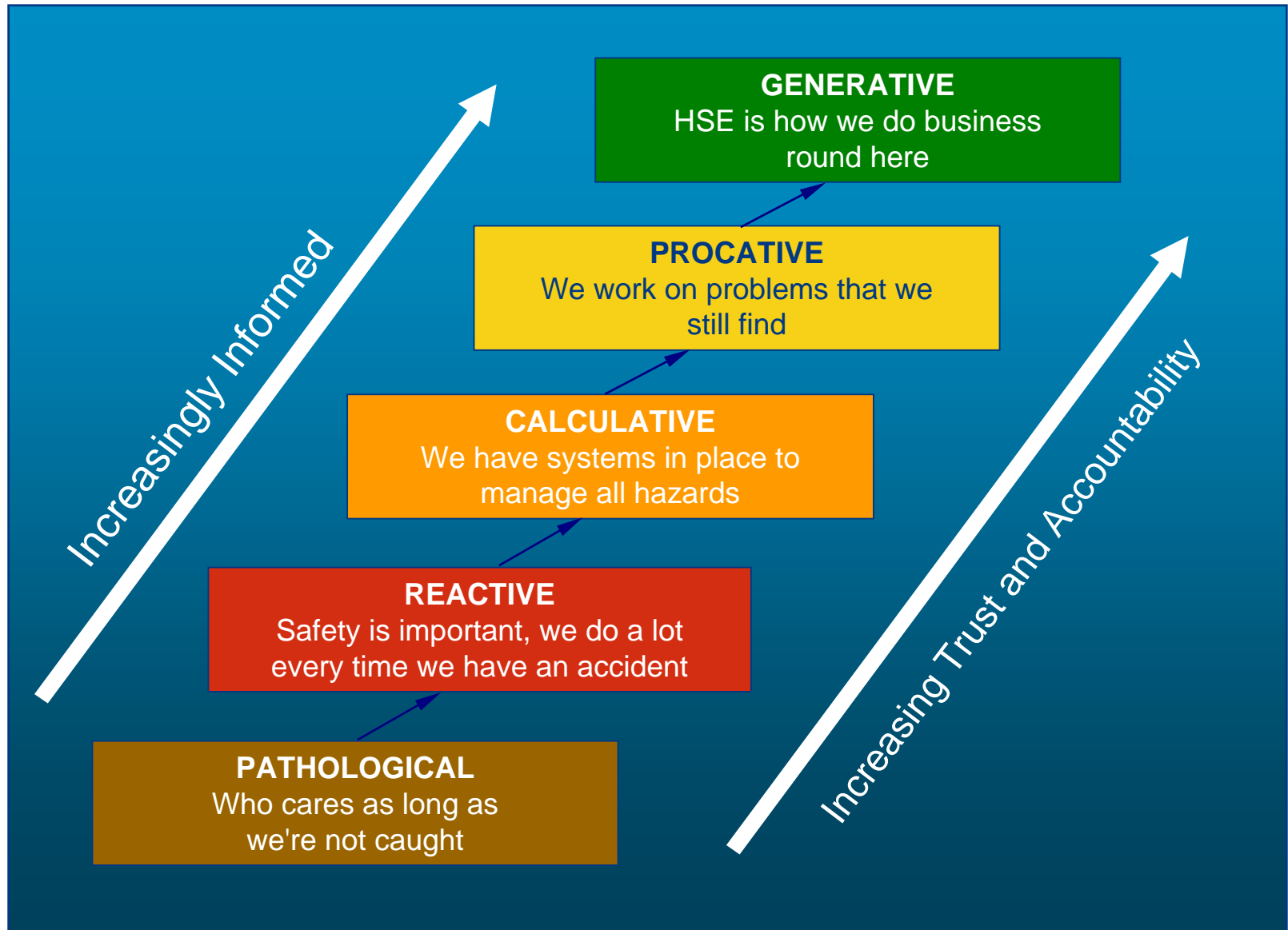
- Investigate incidents
- Clearly identify all the actions/decisions which caused holes in the defenses
- Error or Violation?
- Why did the person do that?
- Apply just and fair consequences to individual and their supervisor /manager

PROACTIVE

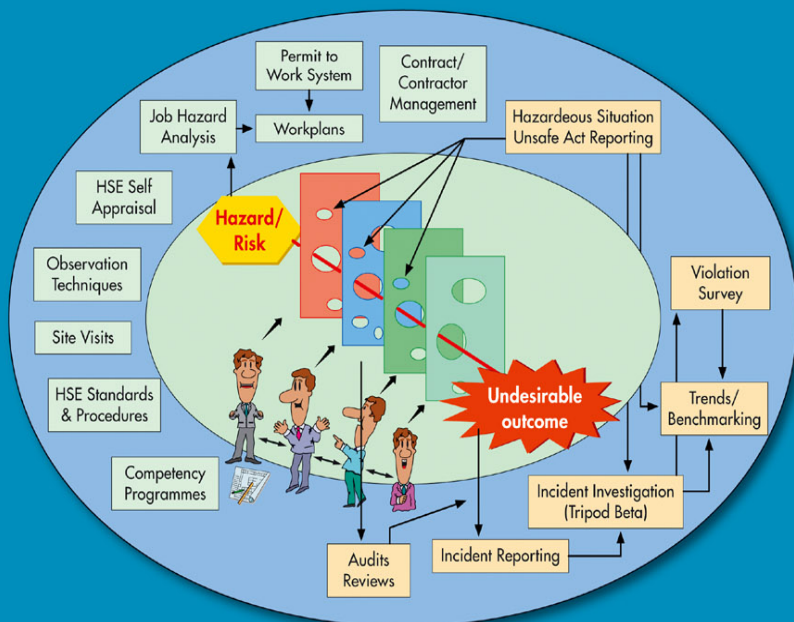
- Explore reasons for rule-breaking
- Focus on specific “problematic” procedures
- Debate the need for the procedure
- Workforce find own solutions to problems
 - Change the procedure
 - Make resources available,
 - Training
 - Forcing Functions
- Create compliance



Culture Ladder

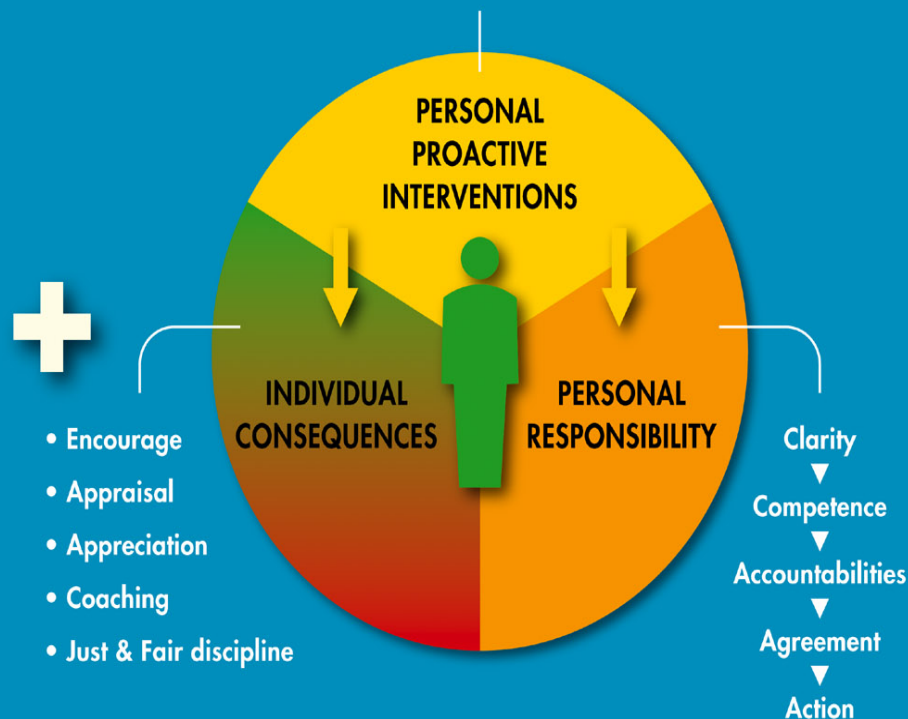


Hearts and Minds: Bringing HSE to Life



It marries HSE risk management

"Hearts and Minds" Tools
Following the Change Process



To people and actions



The Lethal Cocktail

Expectation - Poor expectations that people will find themselves repeating past violations because nothing has changed

Powerfulness - The feeling that competent people can get away with it

Opportunity - There are still lots of opportunities

Planning - Violation is a natural adaptation to poor planning

The Antidote

Personal Norms – Belief that a professional would do it that way (following the rules)

Types of Rule-Breaking: A Situational Violation



I could not get the job done if I followed the procedures, but I did the job anyway

Types of Rule-Breaking: A Routine Violation



Other people here do it the same way

Types of Rule-Breaking: An Optimising Violation



I thought it was better (for the company) to do it that way

Types of Rule-Breaking: An Exceptional Violation

People have to solve problems for the first time and fail to follow good practice

New, difficult or dangerous situations

Example:

During the Piper Alpha incident, a couple of the crew decided to leave the mustering area whereas most of the crew stayed-put (the rule said so). Those who made the former choice, survived.

Procedures and Practices scores

Item 1-5	Items 6-10	Items 11-20	Items 21-30	Items 31-40	Items 41-45
Substantial Understanding	Substantial Awareness	Baseline	Substantial	Optimising	Exceptional
11	15	21	42	36	13
34	15	24	91	32	12
17	15	52	87	85	12
17	12	71	32	36	11
15	15	24	37	36	18
21	14	49	42	25	11
14	13.1	24.2	34.3	36	12
Critical ? score <15	Critical ? score <15	Critical ? score <20	Critical ? score <30	Critical ? score <30	Critical ? score <15

Specific Examples of Rules or Procedures that lead to Critical Scores

- GRP Minimum Safety Features on Motor Vehicles.
- SYSTEM RESPONSE/TIME TO REACT ON EXTERNAL R.A.B.
- NO SYSTEMS OF CASHING, WEB 2.0, etc.
- DOCUMENT CONTROL
- INSTRUCTION
- TEMP

Do we need this procedure ?

Procedure	GRP Min. VEHICLE SAFETY STANDARDS.
Hazards managed by procedure	ROAD SAFETY.

YES (Arguments)



NO (Arguments)



Compliance

Impact of the rule/procedure

GROUPS
MANAGEMENTS CO
LINESS.

Action Plan

ACTION

What are we going to do ?

Who will do it ?

When will it be done ?

Who will review it ?

the

Procedures and Practices score

Type of rule breaking	Item 1-5	Item 6-10	Item 11-20	Item 21-30	Item 31-40	Item 41-45
	Unintentional Understanding	Unintentional Awareness	Routine	Situational	Optimizing	Exceptional
Scores						
Average						
	Critical? Score <15	Critical? Score <15	Critical? Score <30	Critical? Score <30	Critical? Score <30	Critical? Score <15

Example of Rule Breaking

Specific Example of Rule or Procedure that Lead to Critical Score

Action Plan

ACTION	
What are we going to do?	
Who will do it?	
When will it be done?	
Who will review it?	
When will the review take place?	