



FIVE CORNERSTONES OF HSE MANAGEMENT

From Clear Standards to Consistent Practice

A White Paper on Building an Effective Health Safety and Environment Program

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Executive perspective

An effective health, safety and environment program gives people a clear answer to five questions. What must I know? What must I do? What happens when requirements are ignored? What must happen when the planned method cannot be followed? When must I intervene?

This paper develops five practical rules into a framework for leaders, supervisors, HSE professionals and contractors. The central argument is straightforward: standards protect people and the environment only when people understand them, can apply them, and receive consistent support and accountability.

The five rules provide a usable foundation. They do not replace a complete management system. Risk assessment, worker participation, competent supervision, occupational health controls, environmental protection, emergency readiness and performance review give the rules substance.

The five rules

- 1 Know the applicable HSE standards, procedures and specifications.
- 2 Apply the applicable HSE standards, procedures and specifications.
- 3 Apply fair and consistent consequences when requirements are not followed.
- 4 Seek an approved exemption before departing from an internal requirement, with sufficient risk mitigation and effective controls.
- 5 Correct unsafe behaviour and conditions before they become an incident.

The objective is to make safe work understandable, achievable and consistently expected. The following recommendations translate that objective into daily management practice.

Rule 1 Know what applies

A requirement cannot guide a decision if the person making it does not know it exists or cannot explain what it means. A signature on an induction register confirms attendance. It does not, by itself, demonstrate understanding or competence.

Make requirements usable

Maintain a controlled register of applicable obligations and internal requirements. Identify the owner, current version, affected tasks and verification method. Include occupational health exposures, environmental operating limits, equipment specifications, contractor obligations and emergency arrangements. Resolve conflicting instructions before work begins.

Translate these requirements into task instructions that describe the hazard, the required control and the point at which work must stop. In multilingual or low literacy settings, use demonstrations, photographs, symbols and supported discussion in a language workers understand. Test the meaning of visual instructions with the people who will use them.

Verify competence at the task

Ask workers to explain the task in their own words and demonstrate its essential controls. Ask what could change, what would make them stop, and whom they would contact. Supervisors need the same competence for the work they authorize. Refresher instruction should respond to changed equipment, revised procedures and observed gaps.

Illustrative example

A maintenance crew knows that isolation is required, but several members treat a stop button as isolation. The supervisor uses the actual equipment to demonstrate energy sources, isolation points, stored energy and the approved verification sequence. Each authorized worker then demonstrates the method. The gap closes when competence is demonstrated, rather than when another attendance sheet is completed.

Evidence of effective implementation

Look for current instructions at the point of use, demonstrated task competence, and workers who can explain stop conditions. Sample the workforce across shifts and contractor groups. Treat repeated misunderstanding as a reason to improve the instruction and its delivery.

Leadership question: Can the people exposed to our highest risks explain the controls that protect them, and demonstrate how to check them?

Rule 2 Apply what is required

Knowing the rule is only the starting point. Application depends on suitable equipment, sufficient time, realistic staffing, competent supervision and controls that work under actual operating conditions. Leaders own these conditions.

Build controls into work planning

Before authorizing a task, confirm the scope, foreseeable hazards, required competence, equipment condition and interactions with other work. Identify critical controls whose failure could permit a serious event. Assign responsibility for checking them and define a clear response when a check fails.

Use the hierarchy of controls to guide selection: consider elimination and substitution before engineering controls, administrative measures and personal protective equipment. CCOHS describes this as a ranked approach to hazard control. [1] A toolbox talk or warning sign should not become the default substitute for a practicable physical safeguard.

Check the workplace rather than the paperwork alone

A signed permit is useful only if the conditions it describes exist. Check isolations, guarding, ground conditions, traffic separation, containment and other relevant barriers in the field. Reassess when the task, weather, equipment or surrounding activity changes. Stop affected work when an essential control is absent or ineffective.

Include health and environmental controls in these checks. Dust suppression, noise controls, exposure assessment, health surveillance where appropriate, drainage, spill containment and waste handling need named owners and defined operating criteria. Delayed harm deserves the same management attention as immediate injury.

Illustrative example

A contractor arrives with mobile equipment that does not meet the site specification. Production pressure does not establish suitability. The responsible manager holds the equipment out of service, obtains a competent assessment and requires compliance or a formally approved alternative before use. Procurement and mobilization checks are then corrected to prevent recurrence.

Evidence of effective implementation

Sample critical controls during real work, including nights and weekends. Record failures, restrict exposure, and verify repairs before closure. Management should review recurring resource gaps and contractor deviations alongside production performance.

Leadership question: Have we made compliance achievable, and can we show that the required controls work on every shift?

Rule 3 Make accountability fair and consistent

Consequences matter because repeated acceptance of a deviation teaches people that a stated requirement is optional. However, an automatic punishment response can discourage reporting and leave the causes of failure untouched. Accountability should strengthen both individual responsibility and the operating system.

Understand the decision before deciding the response

Establish what happened, what the person understood, whether the requirement was workable, and which equipment, workload or supervisory conditions influenced the action. HSE guidance emphasizes understanding human failure and its contributing factors when designing controls. [2] The response should consider the conduct and its context, rather than depend only on whether harm occurred.

An inadvertent error may call for support, task redesign or competence development. A shortcut that has become normal may require coaching, removal of conflicting incentives and tighter supervision. Knowing or reckless disregard of a clear, practicable requirement may warrant formal disciplinary action through a fair process. These are proposed decision principles, not automatic classifications.

Apply the same standard at every level

Include managers who direct work without effective controls, supervisors who tolerate repeated deviations, and contractors who knowingly supply unsuitable equipment. A worker should not carry the sole consequence of a choice encouraged by production targets or a supervisor's instruction.

Explain the accountability process in advance. Review evidence, hear the person's account, check consistency with comparable cases and document the rationale. Apply relevant employment processes. Protect good faith reporting and appropriate stop work decisions. Reporting an error should allow learning; it should not excuse deliberate misconduct.

Illustrative example

An operator repeatedly bypasses a required check. Review shows the supervisor has rewarded early starts and routinely accepted incomplete checks. The operator's conduct still requires a response, but so does the supervisor's direction. Management corrects the scheduling expectation, verifies competence and applies proportionate accountability to each person's decisions.

Evidence of effective implementation

Review recurring deviations, fairness concerns and whether people still report hazards openly. Do not use the number of disciplinary actions as a safety success measure. Look for fewer repeated failures and stronger confidence in speaking up.

Leadership question: Would we respond consistently if the person involved were our strongest performer or a senior manager?

Rule 4 Control exemptions before work proceeds

When a requirement cannot be followed, the immediate response is to pause the affected work and escalate the issue. An exemption is a controlled decision about an internal requirement. It must never become informal permission to proceed because a deadline is approaching.

Define the boundary

An internal approval does not override applicable law, permit conditions or requirements imposed by an external authority. Any legally available variance must follow the relevant authority's process. Where the proposed alternative cannot provide adequate protection, the work remains stopped until a suitable method is available.

Require a documented decision

A proposed exemption should identify the exact requirement, the reason compliance is not possible, alternatives considered, affected people and environmental receptors, and the consequences of control failure. A competent technical reviewer should assess the alternative method, its limitations and the residual risk. Involve workers and affected contractors in checking whether the proposal is workable.

Record the additional controls, the people responsible for installing and verifying them, and the evidence needed before release. Specify the task and location, start and expiry times, review frequency, stop conditions and restoration plan. Obtain approval from the designated authority before exposure begins. Seek specialist engineering input where equipment or design changes require it.

Keep approval separate from assurance

Approval does not prove that a control exists. Verify the agreed controls in the field before starting and during the task. Suspend the exemption if conditions change or controls fail. Close it only after confirming that the normal requirement has been restored or a permanent change has passed the formal change process.

Illustrative example

A standard access route is unavailable during a shutdown. The team proposes a temporary route. Before use, a competent review checks separation from operating equipment, ground conditions, lighting, access for emergency response and any other applicable requirements. The temporary route receives a defined duration and inspection owner. If adequate separation cannot be achieved, approval is withheld.

Evidence of effective implementation: a current exemption register, no work under expired approvals, field verification of alternative controls and review of recurring requests. Repeated exemptions should trigger a design or planning review.

Leadership question: Are we managing an exceptional situation, or normalizing a recurring failure to plan?

Rule 5 Intervene before harm occurs

Early intervention turns the first four rules into a visible workplace habit. Everyone should be able to pause a task when a control is missing or an unsafe condition develops. Supervisors must respond constructively and establish what must change before restart.

Make the intervention practical

Approach without creating another exposure. Stop or stabilize the affected activity, explain the specific concern and ask the people involved what they see. Confirm the required control, correct the immediate problem, and obtain the appropriate restart authorization. Follow the site's emergency arrangements where there is imminent danger.

Use clear language: "Let us pause. This equipment can move into the work area. We need the specified separation in place before we restart." The conversation identifies the hazard and the required action without humiliating the person.

Correct the conditions behind the behaviour

Ask why the deviation made sense at that moment. Was access difficult? Was a tool missing? Did the procedure conflict with the equipment? Was fatigue affecting the task? Did management reward speed while overlooking control failures? Correcting the action without addressing these influences invites recurrence.

Also intervene when nobody is visibly doing anything unsafe. A damaged containment system, ineffective ventilation or unstable ground can create harm without a behavioural deviation. Rule 5 therefore requires attention to unsafe behaviour, physical conditions and failed controls together.

Illustrative example

A worker notices a colleague preparing to enter a maintenance area before isolation verification is complete. The worker pauses the job and contacts the supervisor. The team completes the required verification before restart. A later review finds that the handover did not clearly identify who owned the verification step. The supervisor corrects the handover and checks subsequent jobs.

Close the learning loop

Record meaningful interventions and near misses in proportion to their learning value. Assign corrective actions to named owners, communicate the lesson and check effectiveness after implementation. Avoid observation quotas that encourage trivial reports. Recognize useful intervention and reporting without making incident figures a reward target.

Leadership question: When someone interrupts work for a valid concern, does our response encourage the next person to speak up?

Put the five rules into daily management

The five rules work best within a continuing cycle of planning, implementation, checking and improvement. HSE describes this Plan Do Check Act approach as a basis for managing health and safety. [3] The implementation sequence below is a proposed starting point, to be adjusted to the operation's risks and maturity.

A practical first ninety days

Days 1 to 30 Establish the baseline. Confirm the most significant health, safety and environmental risks. Review applicable requirements, critical controls, competence gaps and contractor arrangements. Assign operational owners and consult the workforce.

Days 31 to 60 Test the rules in selected work areas. Verify understanding, check controls during actual work and test the exemption and accountability processes. Include a contractor activity and an after hours shift. Correct weaknesses before expanding.

Days 61 to 90 Expand and review. Apply the approach across the operation, verify corrective action effectiveness and review unresolved control failures with senior leaders. Set the next improvement priorities.

Measure whether protection is improving

Use a small set of measures with defined owners and reliable evidence: demonstrated competence for high risk tasks; critical control checks passed against checks completed; time taken to restore failed controls; overdue high risk actions; repeated deviations; and active or expired exemptions. Pair these with exposure data, relevant environmental results, incidents and workforce feedback. No single score demonstrates that an operation is safe.

Managers should review whether controls remain effective and whether reported actions have actually changed work. A low injury rate does not establish that serious risks, occupational exposures or environmental impacts are controlled. Keep emergency preparedness and response exercises in the program because prevention can fail.

The leadership commitment

We will make requirements clear, provide the resources to follow them, apply fair accountability, control departures before work proceeds, and support timely intervention. These commitments belong in planning, procurement, supervision and contractor management as well as in the HSE function.

Adhere to these five rules and HSE becomes clearer and more manageable. Keeping people and the environment protected still requires daily discipline, competent judgment and evidence that controls work.

References and application notes

This paper presents the author's practical interpretation of the five supplied rules. The implementation examples are illustrative scenarios, not accounts of specific incidents. The framework is intended for adaptation to the operation's applicable obligations and risk profile; it does not claim certification against a management system standard.

Sources

[1] Canadian Centre for Occupational Health and Safety. Hazard and Risk — Hierarchy of Controls. Supports the discussion of control selection in Rule 2.

https://www.ccohs.ca/oshanswers/hsprograms/hazard/hierarchy_controls.html

[2] UK Health and Safety Executive. Managing human failures — Overview. Supports the discussion of human failure and contributing conditions in Rule 3.

<https://www.hse.gov.uk/humanfactors/topics/humanfail.htm>

[3] UK Health and Safety Executive. Introduction to managing health and safety — How to manage health and safety. Supports the management review cycle in the implementation section.

<https://www.hse.gov.uk/managing/introduction/how-to-manage.htm>

Web sources consulted 27 October 2026. UK guidance is used for general management principles, not as a statement of legal requirements for another jurisdiction.

Questions for the next leadership review

Which significant risks currently depend on controls we have not verified?

Where are workers expected to comply without adequate equipment, time or instruction?

Which repeated deviations reveal a weakness in leadership or planning?

Which exemptions should end through a permanent design or process improvement?

What evidence shows that the last corrective actions made work safer?