

Facility Safety

Don't Let Your Lockout/Tagout Training Lapse

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The purpose of this article is to provide a brief overview of **Lockout/Tagout** (LOTO) training, and to provide tips to make this training effective and efficient.

Let's begin by noting precisely what is at stake when implementing a LOTO training program. The stakes are extremely high—the physical safety of employees, the psychological comfort of employees (fostering a safety-focused culture which realizes the importance of well-being), and even the efficiency of a workplace are all directly influenced by the quality of a business's LOTO program. LOTO training requires close consideration, and the resulting program should be subject to evaluation and frequent re-evaluation. A brief overview of LOTO training follows, with the aim of serving as a valuable aid to your training program.

At the outset

The purpose and function of LOTO must be clearly explained at the outset of any effective training program. The function of LOTO is to prevent accidental startup or release of energy in a machine or other equipment during maintenance or servicing. But the control of hazardous energy cannot always be achieved in precisely the same way—different machines and facilities operate in different ways. Specificity is especially important. Abstractions and visuals may be helpful, but should be used primarily as supplementary tools. Hands-on, specific training provides employees with a stronger understanding of the critical safety requirements involved in their jobs. The following must be clearly outlined:

- Specific instructions for shutting down and isolating machines and equipment.
- Specific instructions for the placement and removal of lockout devices.
- Specific instructions detailing responsibility for each lockout device.
- Specific testing requirements, in order to verify the effectiveness of devices and energy control.

Authorized vs. affected employees

Next, let's categorize the types of workers involved in LOTO into two groups: authorized and affected. An authorized employee is directly involved in locking out equipment. In order to be an authorized employee, a worker must be thoroughly trained in lockout procedure. An affected employee refers to any employee whose work is affected by a lockout; generally, this means an employee who is working on locked out equipment. An authorized employee can also be an affected employee and vice-versa, but only an employee who has been through detailed lockout training can be an authorized employee.

Authorized and affected employees need to be in close communication with each other. All employees must clearly know their roles—even a slight deviation from the prescribed roles can have serious, even fatal consequences. Authorized employees must alert all affected employees when a lockout is placed or removed. Authorized employees can only remove devices that they have placed; this prevents accidental removal of lockout devices.

Interactions emphasize communication

It's obvious that industrial workplaces are highly interactive. A safe workplace is aware of its interactivity, and makes a concerted effort to make efficient communication a priority. So special attention needs to be given to group training. Group training is the only way to simulate an actual work environment, in which several workers are performing interconnected tasks.

Group lockout

Small group discussions and exercises are highly recommended, so workers know precisely how to perform their jobs safely. In some cases, working crews will operate under a single group lockout device, in contrast to personal devices for each worker. In order to be implemented, the group lockout method must provide demonstrably equivalent protection to individual lockout devices. When using a group lockout device, an authorized employee has primary responsibility over a set number of workers—only the authorized employee can set or remove the group lockout device. Again, a strong emphasis should be placed on clearly defined roles in order for a LOTO training program to be effective.

Testing requirements

The importance of testing, re-testing, evaluating, and inspecting your lockout program is difficult to overstate, and applies to nearly every aspect of lockout training. Lockout devices themselves should be subject to stringent testing requirements in order to ensure that the devices work properly. A written procedure should provide a standardized testing method, so that all devices are subjected to the same degree of evaluation. Lockout procedure inspections are equally important, and all authorized employees need to be involved. OSHA requires that inspections occur at least annually. Given the importance of an effective lockout program, more frequent inspections are recommended. Indeed, the language used by OSHA — “at least annually”— all but suggests that more frequent inspections are worthy of strong consideration.

Conducting inspections

Inspection requirements and guidelines are provided by OSHA. The inspection must be performed by an authorized employee not using the procedure being inspected. This serves to establish a fresh and more objective review of the procedure in question. As one might expect, any deviations from lockout safety requirements must be corrected. However, merely fixing the problems uncovered by the inspection may not be enough.

A problem with the lockout process could have a deeper root cause, such as ignorance or poor execution of the requirements. If deviations are evident, then essential training exercises should be also revisited. Even if the inspection shows a well-functioning lockout program, revisiting training exercises may well serve to ensure continued success and safety. During inspections, employee responsibilities should be reviewed with each authorized employee.

Beyond lockout

Given the precise nature of lockout requirements, it can sometimes be easy to overlook more general solutions to workplace safety. Fostering a culture of open communication is one solution, and can prevent many problems from developing. Instruct your workers to ask questions if any safety procedure

is less than perfectly clear, at any point. This is a proactive approach that works continuously; one does not have to wait for inspections to occur for problems to be identified and solved.

We have discussed several important aspects of lockout training. These include: hands-on and specific training, clearly defined roles for both authorized and affected employees, frequent inspections, and fostering an open, communicative workplace culture. Lockout programs should be continually tested and reevaluated in order to ensure that set programs and devices are still operating effectively.

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