

ELECTRICAL SAFETY: How to Comply with Group Lockout Requirements



Workers can get hurt, including electrocuted, while adjusting or performing maintenance and repairs on various kinds of energized equipment, such as table saws, conveyors, mixers, etc. That's why the OHS laws require energized equipment to be "locked out" before repair and maintenance work can be done on it. But the use of individual lockout procedures isn't always practical. So that's why several jurisdiction's OHS laws permit so-called "group lockout." Here's what you need to do to comply with group lockout requirements.

Defining Our Terms

This article focuses on group lockout requirements for equipment operated by electricity or another form of energy, as opposed to requirements for "electrical equipment," that is, equipment designed to generate, supply or transmit electricity, which has its own lockout requirements.

HOW TO COMPLY

All Canadian jurisdictions address lockout in their OHS regulations in either a dedicated lockout section or as part of their general sections on machinery and equipment. The lockout requirements address individual workers locking out equipment using personal locks assigned to them. But under certain circumstances, using a group lockout procedure may be more effective or appropriate than an individual lock procedure. That's why five jurisdictions—AB, BC, NB, NL and YK—have specific requirements for group lockout. Although there are some differences between jurisdictions, you should take these basic steps to comply with group lockout requirements:

Step #1: Determine if Group Lockout Is Appropriate

All jurisdictions generally require employers to use lockout to ensure that machinery or equipment can't be turned on, intentionally or accidentally, while

work is carried out on it or when a guard must be removed. In addition, those jurisdictions with group lockout requirements specify when *group* lockout is permitted. (See the chart on page X for the details.)

So you must first determine if a particular situation warrants group lockout as opposed to standard lockout. In AB, BC, NL and YK, group lockout is permitted when:

- A large number of workers (Yukon's OHS law says three or more workers) is working on machinery or equipment that must be locked out; or
- A large number of energy-isolating devices (Yukon's OHS laws says more than four) must be locked out.

In New Brunswick, group lockout is permitted when the standard lockout procedure is inappropriate for the cleaning, maintenance, adjustments or repairs to be performed or is inadequate for the protection of a worker. According to the WHSCC, this rule is generally triggered when three or more workers or five or more energy isolating devices are involved in a lockout.

Insider Says: Your standards for determining when group lockout is permitted should be included in your workplace's general lockout policy. For more information on compliance with general lockout requirements, including creation of a lockout policy, see "Machinery & Equipment: How to Comply with Lockout Requirements," July 2011, p. 1.

Step #2: Develop Group Lockout Procedures

If you determine that the circumstances warrant use of group lockout, you must develop written group lockout procedures that cover the steps to be used and the responsibilities of everyone involved in a group lockout. (New Brunswick calls it a "code of practice" for group lockout.) These procedures should be tailored to the specific machinery or equipment involved.

Group lockout procedures should be developed by a competent person and may need to be developed in consultation with the JHSC. You should make these procedures readily available to workers at the location where they'll be used, such as posting them by the machinery to which they relate.

Group lockout procedures involve certain steps that must be performed by one or more "competent" or "qualified" workers, that is, workers who are knowledgeable about the work, the hazards involved and the means to control those hazards due to education, training, experience or some combination. These competent or qualified workers could be supervisors, lead hands or specially trained workers. The remaining steps are performed by "regular" workers.

Insider Says: For more information on what makes a worker "competent" or "qualified," see "Compliance 101: What Makes a Worker a 'Competent Person' under OHS Laws'" Sept. 2008, p. 11.

A group lockout procedure will generally include certain steps. For example, first, the competent worker(s) will typically:

- Independently lock out the energy isolating devices;
- Secure the keys for these locks, such as in a lock or key box;
- Complete, sign and post a checklist that identifies the machinery or

- equipment components covered by the lockout; and
- Confirm that all hazardous energy sources have been effectively isolated.

Then, before individual workers begin work on the locked out equipment, they must apply their personal locks to the lock box. And when they're done, they must remove their personal locks. When all of the personal locks have been removed and the competent worker(s) have determined that it's safe to end the group lockout, they must remove their personal locks from the lock box and restore the machinery to its usual operation.

Step #3: Provide Personal Locks and Lock Box

For workers to comply with the group lockout procedures, the company will need to provide them with personal locks, such as those used in a standard lockout procedure. These locks should *not* be combination locks. In addition, a personal lock should identify the worker to whom it belongs with a unique mark or identification tag in case a supervisor or co-workers need to contact that person to remove the lock, such as in an emergency or at the end of a shift. The employer will also need to provide a key securing system, such as a lock or key box, for use by the competent worker(s) in initially securing the machinery.

Step #4: Train Workers on Group Lockout Procedures

As with all safety procedures, it's critical to train workers on group lockout procedures and ensure that they understand this training. Who should get group lockout training? Any workers who may need to participate in a group lockout for a particular piece of equipment should be trained in the written group lockout procedure for that equipment.

Group lockout training should be included in your general lockout training, which should also cover:

- The importance of lockouts;
- Legal requirements for lockouts;
- Company policy on lockouts;
- The energy forms, hazards and procedures (administrative and work-related) that must be followed;
- The importance of following lockout procedures;
- Lockout errors to be avoided, such as assuming the equipment is inoperable or that the job is too small to warrant a lockout;
- The use and care of PPE; and
- Proper use of all tools, including locks.

Step #5: Enforce and Update Procedures as Necessary

Failing to comply with the company's group lockout procedures can have terrible consequences—both for workers and the company. So it's critical that you enforce the company's group lockout procedures by disciplining workers who violate it. It's also important to keep the procedures up-to-date. For example, you may need to revise them when new equipment is introduced into the workplace or when the group lockout requirements in your jurisdiction change. Of course, any time you

change the group lockout procedures, you must retrain the workers who have to use them.

BOTTOM LINE

Companies have a duty to implement lockout and group lockout procedures to protect workers while repairing and maintaining equipment and machinery. But unfortunately, lockout violations are all too common.

Example: A sawmill worker in BC turned off the edger saw he was operating to clean it of sawdust and debris. But because he didn't lock it out, the saw blade was still turning while he cleaned it. His right arm came in contact with the spinning blade and was amputated below the elbow. The sawmill was convicted of several safety offences, including violating the lockout requirements. The sawmill appealed.

The BC Workers' Compensation Appeals Tribunal ruled that the company hadn't exercised due diligence as to the lockout requirements. The sawmill was aware that lockout procedures were a "fundamental safety requirement" and yet neglected to implement them. For example, it didn't have any specific lockout procedures for cleaning the edger saw or provide a personal lock to the worker to use to lock out the saw. If there had been a lockout procedure in place and the worker had been adequately trained, it's unlikely that the incident would have happened, concluded the Tribunal [*WCAT-2008-02347*, [2008] CanLII 49973 (BC W.C.A.T.), Aug. 8, 2008].

So it's critical that safety coordinators ensure that their companies have lockout and group lockout procedures to ensure that they fulfill this duty.

US Group Lockout Requirements

Does your company have facilities in the US? If so, our sister site SafetySmartCompliance.com can tell you how to comply with OSHA's group lockout requirements