

Lockout/Tagout Audits: Closing the Gaps Before They Cost You



If you ask any seasoned safety manager which piece of equipment worries them most, the answer often isn't the largest crane or the highest scaffold – it's the machine that looks harmless because it's turned off. The truth is, some of the most catastrophic workplace injuries happen when equipment is de-energized but not truly secured. That's where lockout/tagout (LOTO) programs come in, and that's why LOTO audits aren't just a compliance exercise – they're a life-saving necessity.

Across Canada, every jurisdiction requires employers to have written procedures for controlling hazardous energy. In Ontario, the Industrial Establishments Regulation is blunt: before work is done on a machine, it has to be rendered inoperative and locked out. In B.C., WorkSafeBC's Part 10 rules go even further, specifying not only the requirement to isolate energy sources but also the sequence of steps and verification. The challenge is that, even when policies exist, the gap between what's written and what's practiced can be wide.

Why Auditing Matters

Lockout/tagout failures are a consistent driver of fatalities and serious injuries. WorkSafeBC reported multiple cases in

the last decade where workers were crushed or amputated because a piece of equipment “started unexpectedly.” In one instance, a conveyor was believed to be off when a worker climbed inside to clear a jam. The power wasn’t isolated, and when the conveyor restarted, the worker didn’t survive.

What makes these incidents even harder for employers is that they almost always involve clear, enforceable rules. When investigators arrive, they’re not asking “was this foreseeable?” but rather “why wasn’t the lockout procedure followed?” An audit gives you the chance to answer that question proactively, before you’re standing in front of a coroner or regulator.

What a Proper LOTO Audit Looks Like

Think of a lockout/tagout audit as a stress test for your program. The goal isn’t to produce a binder of checkmarks, but to see whether the safeguards you think are in place are actually protecting people.

The first step is reviewing your **written procedures**. Do they exist for every single piece of equipment? A generic, one-size-fits-all policy won’t cut it. Each machine should have a step-by-step sequence identifying energy sources, isolation points, and verification steps. Yet in practice, audits often uncover missing or outdated procedures – equipment installed years ago with no documented lockout, or new modifications that changed the isolation points without updating the instructions.

The second step is verifying **training and competence**. In most provinces, workers must be “competent” to perform lockout. Audits should ask: have workers been trained on the specific procedures for the equipment they use? Can they demonstrate the steps without relying on memory alone? In one Ontario

case, a worker was trained generally on lockout but not on the hydraulic system of a modified press. The misunderstanding led to a serious injury when stored energy released unexpectedly. The company's failure to verify training was cited as a compliance breach.

The third step is direct **observation in the field**. Policies on paper mean little if, in reality, workers are using shortcuts. During audits, it's common to see locks missing, tags handwritten and illegible, or verification steps skipped because "we've done this a hundred times." These are the moments that matter – catching the gap when it's a near miss, not when it's a tragedy.

Common Errors and Risk Traps

One of the most frequent errors uncovered in audits is **group lockout confusion**. In theory, everyone places their own lock on the hasp, ensuring no one can restart the machine until every worker has removed their lock. In practice, audits often reveal "buddy systems" where one worker locks out "for the group." This not only undermines the entire concept but also leaves the employer defenseless if something goes wrong.

Another trap is **stored energy**. Electrical sources are obvious, but many audits reveal weaknesses in controlling hydraulic, pneumatic, or gravitational energy. Workers may bleed pressure from a line but fail to block or support a raised load. A tragic case in Manitoba involved a worker pinned by a press ram that slowly descended after being shut down. The root cause: a lockout procedure that ignored gravity.

Audits also frequently expose **tag-only practices**. Tags are warning devices, not protective devices. Relying on a tag without an actual lock in place is a compliance failure under every Canadian regulation. Yet it persists because it's quicker, or because supervisors haven't enforced the distinction.

Finally, there's the risk of **complacency**. Workers who service the same equipment daily may begin skipping steps, convinced nothing will happen. An audit that interviews workers, reviews logs, and observes practices can highlight this creeping normalization of shortcuts.

How to Conduct an Effective Audit

An audit should be led by someone with both technical knowledge and the authority to act. It's not enough to send out a junior safety coordinator with a clipboard. The audit leader must understand the equipment, the regulatory requirements, and the organizational dynamics that might push workers toward shortcuts.

Start by mapping your equipment inventory against your lockout procedures. Are there machines with no documented steps? Next, interview a cross-section of workers: do they know where procedures are kept, and can they describe how to lock out their machine? Then move to direct observation. Watch an actual lockout being performed. Is the worker isolating all energy sources? Are they verifying the lockout before starting work?

A strong audit doesn't just point out gaps – it assigns responsibility and timelines for fixes. If a procedure is missing, who will write it, and by when? If training is outdated, how soon can it be refreshed? If supervisors are tolerating tag-only practices, what corrective coaching or discipline is required?

Protecting Your Business and Staying Compliant

The regulatory stakes are high. In Ontario, failure to follow lockout/tagout rules can lead to six-figure fines. In B.C., companies have faced penalties exceeding \$250,000 for fatal

lockout failures. Across Canada, courts have made it clear: “I didn’t know” is not a defense when the regulations are explicit.

But compliance is only part of the picture. An effective lockout/tagout program protects your reputation with workers, regulators, and clients. It demonstrates that your organization takes energy control seriously, values the lives of its people, and is proactive in preventing catastrophic events.

From a practical standpoint, a lockout/tagout audit should be scheduled at least annually, with interim checks after new equipment installations or modifications. Document the results, track corrective actions, and review them with your Joint Health and Safety Committee. That record of continuous improvement not only strengthens your defense in the event of a claim, but also builds a culture where workers trust the system.

The Takeaway for Safety Leaders

Lockout/tagout isn’t glamorous. It doesn’t make headlines when it works. But when it fails, the consequences are severe and unforgettable. As psychological injury claims are reshaping the boundaries of workplace safety, LOTO audits remind us of a fundamental truth: safety is built in the details.

For safety managers and directors, the question isn’t whether you have a lockout/tagout program. The real question is: have you tested it, verified it, and closed the gaps that audits inevitably reveal? Because in the end, the best time to find out your program has weaknesses is during an audit – not during a coroner’s inquest.

Lockout/Tagout Audit Tool

Lockout/tagout failures remain one of the most consistent causes of catastrophic workplace incidents. This audit tool helps you measure whether your program is more than words on paper – whether it's being followed, enforced, and improved. Use it to score your compliance, identify weaknesses, and assign corrective actions before regulators or incidents do it for you.

How to Use This Tool

1. Review each question.
2. Score yourself honestly:
2 points = Fully in place and up-to-date.
1 point = Partially in place or outdated.
0 points = Not in place.
3. Add your score for a readiness rating.
4. Treat any "0" score as a priority corrective action.

Section A – Written Procedures (Max 12 points)

Question	Score (0–2)
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| <ul style="list-style-type: none">▪ Does every machine and piece of equipment with hazardous energy have a written, step-by-step lockout procedure?▪ Are procedures specific to each machine (not generic) and do they identify all energy sources (electrical, hydraulic, pneumatic, gravity, etc.)?▪ Are written procedures reviewed annually or when equipment is modified?▪ Are procedures posted at or near the equipment where practical?▪ Do procedures include verification steps to test isolation before work begins?▪ Are procedures available in all languages and formats | |
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required by the workforce?

Section B – Training & Competence (Max 14 points)

Question **Score (0–2)**

- Have all authorized workers been trained on LOTO procedures specific to their equipment?
- Can workers demonstrate lockout/tagout steps during audits without coaching?
- Are affected workers (those working around but not servicing equipment) trained on the meaning of locks/tags and related rules?
- Are new employees trained before they are exposed to hazardous energy?
- Is refresher training provided at least every 3 years, or sooner if audits show gaps?
- Are contractors trained and monitored for compliance with site-specific LOTO rules?

Section C – Devices & Equipment (Max 12 points)

Question **Score (0–2)**

- Are lockout devices (locks, hasps, tags) standardized in color, shape, or size to distinguish them from other locks?
- Are locks uniquely keyed so no two workers share the same key?
- Are tags durable, legible, and include worker identification and contact info?
- Are devices readily available at all work areas and in sufficient quantities?
- Are defective or missing devices replaced promptly?
- Are group lock boxes or hasps available for multi-worker

lockouts?

Section D – Supervision & Enforcement (Max 12 points)

Question	Score (0–2)
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| <ul style="list-style-type: none">▪ Do supervisors enforce “one lock, one worker” rules consistently?▪ Are audits or observations of lockout performed at least annually as required by CSA Z460?▪ Are corrective actions taken when shortcuts or non-compliance are observed?▪ Is discipline applied consistently for violations of lockout/tagout procedures?▪ Are supervisors trained in LOTO procedures themselves?▪ Are lessons learned from near misses integrated into procedures and training? | |
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Section E – Field Verification (Max 14 points)

Question	Score (0–2)
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| <ul style="list-style-type: none">▪ Do workers actually de-energize and isolate all sources before servicing equipment?▪ Are stored energies (hydraulic, pneumatic, gravity, thermal) released or blocked?▪ Is a test or verification step conducted before starting work?▪ Are locks removed only by the worker who applied them (or through a formal procedure if unavailable)?▪ Are group lockouts performed correctly with every worker applying their own lock?▪ Is equipment restart always controlled and authorized after lock removal?▪ Are observations of live lockout procedures documented | |
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during audits?

Section F – Program Management (Max 12 points)

Question

Score (0–2)

- Is there a designated program owner responsible for lockout/tagout compliance?
- Are program documents (procedures, training, audits) organized and accessible for inspection?
- Is there a system for tracking and closing corrective actions from audits?
- Does the Joint Health and Safety Committee review lockout/tagout issues at least annually?
- Are contractors' lockout/tagout practices audited as part of site safety inspections?
- Is the lockout/tagout program reviewed after any serious incident or near miss?

Scoring & Readiness Rating

Total Possible Points: 76

Readiness Rating:

- **69–76 points (90%–100%)** = Response-Ready: Strong program; keep auditing and refreshing training.
- **57–68 points (75%–89%)** = Operationally Sound: Core elements in place; close minor gaps.
- **45–56 points (60%–74%)** = Needs Improvement: Significant weaknesses; compliance and safety risks likely.
- **Below 45 points (<60%)** = High Risk: Program deficient; immediate corrective action needed.

Manager's Tip:

Don't just file this audit away. Review it with supervisors and your JHSC, assign fixes with deadlines, and circle back. Lockout/tagout is one of the most enforceable, black-and-white

obligations you have – if your audit shows weakness, regulators will find it too.

Top 5 Lockout/Tagout Audit Findings – and How to Fix Them

Every safety manager knows the rule: *before you service it, you lock it out*. Yet audit after audit shows the same patterns of failure. They're not exotic, they're not hidden – they're the everyday shortcuts and oversights that, left unchecked, can cost a life and bring regulators to your door.

Here are the five most common lockout/tagout (LOTO) audit findings across Canadian workplaces – and what you can do about them.

1. Missing or Outdated Procedures

During one Ontario inspection, a company had dozens of machines but written lockout steps for only half of them. A worker improvised on an unlisted machine, missed a hidden pneumatic source, and ended up seriously injured.

Fix: Create machine-specific lockout instructions for every piece of equipment with hazardous energy. Review them annually or whenever equipment is modified. Generic “catch-all” procedures don't cut it.

2. Group Lockout Done Wrong

In a Manitoba case, a crew relied on a single worker to place a lock “for everyone.” When the worker left the site early, another person removed the lock and re-energized the machine – not realizing two others were still inside.

Fix: Enforce the “one lock, one worker” principle without

exception. Every worker exposed to the hazard applies and removes their own lock. Use hasps or lock boxes if multiple locks are required.

3. Ignoring Stored Energy

Hydraulics, pneumatics, springs, and even gravity are often overlooked. A Saskatchewan press slowly drifted down hours after being “locked out,” fatally crushing a mechanic. The written procedure didn’t include blocking the ram.

Fix: Lockout must isolate and release *all* hazardous energy – not just electrical. Train workers to bleed, block, or secure stored energy sources, and verify before entry.

4. Tags Used Instead of Locks

Auditors still find tags hanging where locks should be. Tags are warnings – not protective devices. In Alberta, a worker assumed a tagged valve was secure, only to have another person open it.

Fix: Make it clear: locks are mandatory. Tags may supplement locks for information but never replace them. Supervisors should treat tag-only practices as a compliance breach.

5. Complacency and Shortcuts

Perhaps the most dangerous finding isn’t a missing lock but a missing habit. Workers who service the same machine daily sometimes skip steps, convinced nothing will happen. In B.C., a veteran mechanic “just shut it off” instead of locking out. The conveyor restarted automatically, with tragic results.

Fix: Refresh training regularly, rotate auditors to observe work, and address shortcuts immediately. Culture is as

important as compliance – if people believe rules can be bent, your program is already failing.

Final Word for Safety Leaders

Lockout/tagout is one of the clearest, most enforceable obligations in OHS law. Inspectors know the common failures, and courts have little patience for excuses when workers are killed or maimed by equipment that should have been locked out.

Your defense is simple: show that your procedures are current, your training is effective, and your audits are real. If your findings look like the five above, treat them as red flags – and fix them before the regulator does.