

Why Your Hazard Assessment Is Lying to You



The Assumption That Quietly Breaks Most Safety Systems

Most organizations believe their hazard assessments are accurate.

They have been completed, reviewed, and approved. The hazards are identified. The controls are documented. Workers have been trained. From a system perspective, everything appears to be in place.

But when serious incidents occur, the investigation rarely reveals unknown hazards. More often, it reveals something far more difficult to defend: the hazard was already identified, the control already defined, and the system already in place—but the control was no longer functioning the way the organization believed it was.

This is where the real exposure exists.

Not in what you do not know, but in what you assume is still working.

Across Canadian workplaces, regulators are increasingly focused on this distinction. They are not asking whether you have a hazard assessment. They are asking whether your controls are actually working in real conditions, with real

workers, at the moment the work is being performed.

And for many organizations, that is where the system begins to break down.

How Hazard Assessments Drift Away from Reality

To understand why this happens, it helps to look at how work actually evolves over time.

Hazard assessments are typically created at a fixed point. They reflect a set of conditions, assumptions, and expectations about how a job will be performed. At that moment, they may be entirely accurate. The controls are appropriate. The procedures are aligned. The risks are understood.

But work does not stay fixed.

Equipment is modified or replaced. Production pressures fluctuate. Experienced workers develop shortcuts that make tasks more efficient. New workers interpret procedures differently. Environmental conditions shift across seasons. Supervisors make judgment calls to keep operations moving.

Each of these changes may seem minor in isolation. None of them necessarily trigger a formal reassessment. But collectively, they begin to reshape how the job is actually performed.

Over time, the gap between documented work and real work widens.

This is what we refer to as **known hazard drift**. The hazard itself has not changed. The organization is aware of it. The control still exists on paper. But in practice, the control has been altered, bypassed, or inconsistently applied in ways that are no longer visible to the system.

The result is a safety program that appears compliant but is no longer fully aligned with operational reality.

Why Strong Systems Still Fail

This issue is not limited to weak or immature safety programs. In fact, it often appears in organizations that have invested heavily in documentation, training, and formal processes.

The failure is not in identifying hazards. It is in assuming that once identified and controlled, they remain controlled.

Most systems are designed around completion. Was the hazard assessment conducted? Were the procedures written? Was the training delivered? Were the forms signed?

These are important questions, but they are backward-looking. They confirm that something was done at a point in time. They do not confirm that it is still functioning as intended.

This distinction is critical, and it is the same pattern seen in broader OHS audits. Organizations often verify that systems exist, but fail to verify whether those systems are effective in practice

As a result, safety programs become administratively strong but operationally blind.

What Inspectors Are Testing Now

There has been a clear shift in enforcement approach across Canada. Inspectors are increasingly focused on alignment between documentation and observed work.

In practice, this means they will review your hazard assessment or safe work procedure, then observe the job being performed, and then speak directly with workers and supervisors.

They are not simply checking whether the documentation exists.

They are testing whether it reflects reality.

If a procedure states that a machine guard must be in place, but the guard has been removed or bypassed, the issue is not a missing document. It is a failure of control implementation. If a lockout process is documented but not consistently followed, the organization is exposed not only on compliance, but on due diligence.

This is where known hazard drift becomes visible.

Once that disconnect is established, it has cascading implications. Training effectiveness is called into question. Supervisor oversight is scrutinized. The integrity of the internal responsibility system is challenged.

At that point, the organization is no longer defending its program. It is explaining why its program does not reflect its operations.

The Operational Reality Behind Most Incidents

When you look closely at serious workplace incidents, a consistent pattern emerges.

- The hazard was understood.
- The control was defined.
- The work was initially performed correctly.

Then, gradually, the control was adapted.

A step is skipped because it slows production. A tool is used differently because it is more efficient. A procedure is modified informally because experienced workers believe they understand the risk.

For a period of time, nothing goes wrong. That reinforces the belief that the adaptation is acceptable. It becomes

normalized. Supervisors observe it and do not intervene, either because they are not trained to challenge it or because it has become part of how work gets done.

Eventually, conditions change just enough to expose the weakness in that adapted control. A new worker is introduced. A load is heavier than expected. Equipment behaves unpredictably. Environmental factors shift.

At that point, the system is no longer operating with the control it was designed around. It is operating with a degraded version of that control.

That is when the incident occurs.

And when it is investigated, the organization is left explaining why a known hazard was not effectively controlled, despite having documented procedures in place.

Why Scheduled Reviews Don't Solve the Problem

Many organizations rely on annual or periodic reviews of hazard assessments as their primary mechanism for maintaining accuracy.

While this satisfies a basic compliance expectation, it does not address how quickly conditions can change in an operational environment.

Hazard drift does not occur on a schedule. It occurs continuously, driven by small, incremental changes in how work is performed.

A new piece of equipment introduced mid-year can change risk profiles immediately. A spike in production can alter how tasks are executed within weeks. Staff turnover can shift competency levels overnight. Seasonal conditions can introduce entirely different hazards.

By the time a scheduled review takes place, the assessment may already be misaligned with reality in multiple ways.

Effective systems recognize that hazard assessment is not an event. It is an ongoing validation process.

Where Supervisors Become the Critical Control Point

If hazard drift occurs in the gap between documented procedures and actual work, then the individuals closest to that gap are supervisors.

They observe how work is actually performed. They see where procedures are followed and where they are adapted. They understand the pressures that drive those adaptations.

Yet in many organizations, supervisors are not formally accountable for validating whether hazard controls are functioning as intended. Their role is often framed around productivity, immediate problem-solving, and administrative sign-off.

Without a structured expectation to verify control effectiveness, supervisors become passive observers of drift rather than active managers of it.

This is not a failure of individuals. It is a failure of system design.

When organizations explicitly position supervisors as responsible for confirming that controls are working in real conditions—not just present in documentation—the entire dynamic changes. Hazard drift becomes visible earlier. Deviations are addressed before they normalize. The system begins to reflect reality again.

Building a System That Reflects Real Work

Organizations that manage this risk effectively do not rely solely on documentation. They build mechanisms to continuously test whether their assumptions about work remain valid.

This begins with a simple but powerful shift in perspective.

Instead of asking whether a hazard assessment exists, they ask whether the hazard is actually controlled today.

That question drives a different set of behaviours. Supervisors spend time observing tasks and comparing them to documented procedures. Workers are asked to describe how they actually perform their work, not how it is written. Deviations are treated as signals that the system needs to be updated or reinforced, rather than ignored.

Over time, this creates a feedback loop between documentation and operation. Hazard assessments are updated when conditions change. Controls are reinforced when they begin to degrade. Training is adjusted based on how work is actually performed.

The system becomes dynamic, not static.

What Strong, Defensible Systems Look Like in Practice

When regulators ask for proof, organizations that have addressed hazard drift are able to demonstrate more than completed assessments.

They can show when hazard controls were last validated in the field. They can explain what triggered updates to their assessments. They can demonstrate how worker input influenced procedures. They can provide evidence of corrective actions taken when gaps were identified, and who was accountable for those actions.

This level of detail does not come from more paperwork. It comes from a system that is actively engaged with how work is performed.

It signals that the organization is not simply documenting safety, but managing it.

The Strategic Risk Most Organizations Miss

The greatest risk in most safety programs is not that hazards are unidentified.

It is that organizations assume those hazards are still under control.

That assumption is rarely challenged until something forces it to be. An incident. A near miss. An inspection.

At that point, the gap between system and reality is no longer theoretical. It is visible, measurable, and difficult to defend.

Final Thoughts

A hazard assessment is only as strong as its connection to real work. If it reflects how tasks were performed six months ago, but not how they are performed today, it is no longer a control. It is a record.

And in an enforcement environment that is increasingly focused on effectiveness rather than intention, that distinction matters. Because regulators are not evaluating what your system says should be happening.

They are evaluating what is happening. And whether your controls are working—right now.