

TOOLBOX TALK: COMPLACENCY

Job or site _____

Date _____

Led by _____

Open with this

Somebody tell me the single most cited OSHA standard in the country. Now tell me how long you think it has been number one. It is fall protection, and the answer is more than a decade.

The talk

Here is the whole federal top ten for the last fiscal year, and it is worth hearing as a list. Fall protection. Hazard communication. Ladders. Lockout tagout. Respiratory protection. Scaffolding. Fall protection training. Powered industrial trucks. Eye and face protection. Machine guarding.

Read it again and notice what is not on it. There is no new technology on that list. There is no hazard anybody needed a degree to spot. Every single one of those is a thing this crew already knows about, has been told about, and could name blindfolded.

So the interesting question is not what people do not know. It is why knowing makes no difference. And the answer is that a hazard you have survived stops registering as a hazard. The ladder you footed wrong a hundred times and walked away from a hundred times has taught you, with real evidence, that footing it wrong is fine.

That is not stupidity. That is exactly how a person is supposed to learn, and on this job it is pointed the wrong way round, because the feedback you get from a near miss is identical to the feedback you get from doing it right. You walk away either way.

Watch for the four places it bites. The task so familiar you can do it while talking. The last twenty minutes of the day. The five minute job you decided was too short to set up for. And the second time, because the first time you were careful and nothing happened, which is the lesson that does the damage.

The counter to it is not caring more. Everybody here already cares. It is putting the decision somewhere other than your own judgment in the moment: the harness clipped before you are near the edge rather than when you feel exposed, the guard on before the cut rather than for the awkward one, the ladder tied at the top every time including the two minute job.

And one more thing, for the experienced hands. The younger ones are learning from you right now, and what they can see is the shortcut, not the thirty years of judgment underneath it. They will copy the shortcut without the judgment. That is how yours becomes theirs, with none of the practice that made it survivable for you.

Point at these before anybody starts

- The task on this site that everybody here could do in their sleep. That one.
- One shortcut on this job that has worked every single time so far.
- The five minute job somebody is going to do without setting up for it today.
- Whatever we are planning for the last half hour of this shift.
- The newest person here, and which of your habits they have already copied.
- Any tool on this site with its guard swung back, taped or removed.

The rules that apply

- Fall protection, general requirements, 29 CFR 1926.501, is the most cited standard in the country and has been for years.
- Hazard communication, 29 CFR 1910.1200, is second, which means labels and safety data sheets, not anything exotic.
- Ladders in construction, 29 CFR 1926.1053, is third, and scaffolding, 29 CFR 1926.451, is sixth.
- Fall protection training, 29 CFR 1926.503, is seventh in its own right, separately from the fall protection standard itself.
- Eye and face protection in construction, 29 CFR 1926.102, is ninth, and machine guarding is tenth.
- Under Section 5(a)(1) the employer must keep the workplace free of recognized hazards likely to cause death or serious physical harm, and a hazard everybody has got used to is still a recognized one.

Ask the crew

- What is the one job here you would do without thinking? What does it need that you skip?
- Name a shortcut on this site that has worked every time so far.
- Which of the top ten would an inspector write us up for if they walked on today?

Close with this

Nothing on that list is a surprise. That is the point of reading it out.

Attendance

Everybody who was present signs, including subcontractors and anybody visiting the site.

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This talk is general safety information for a crew briefing, not legal advice and not a substitute for the training your employees are required to have. Standards are quoted for orientation only. Check the current text of the standard and your own state plan, which may be stricter than the federal rule.