

BLACK SWAN CONSULTING — FIELD ASSESSMENT RESOURCE

10 Signs Your Safety Program Has Critical Gaps

A field-built self-audit. Drawn from nearly three decades of oil and gas operations.

Your safety program may look complete on paper. Policies in the binder. Training records on file. Incident rates that satisfy your insurance carrier. But paper compliance and operational safety are two different things, and the gap between them is where incidents happen. If three or more of the following signs apply to your operation, your program has critical gaps. Some of them you already know about. Others you may not recognize until you see them written down.

SIGN 01**Your safety training is the same for every role.**

When a roustabout and a company man sit through identical training, one of them isn't learning anything relevant. Effective training is built around specific job tasks, specific equipment, and specific hazards, and it looks nothing like a generic curriculum built to satisfy a recordkeeping requirement.

SIGN 03**Your near-miss reports don't reflect reality.**

If your workforce believes reporting a near-miss leads to discipline, they'll stop reporting them. Near-miss data is the most valuable leading indicator you have. Zero near-miss reports rarely means a safe workforce. Usually it means a workforce that's stopped trusting the system.

SIGN 02**Your incident investigations end with who, not why.**

If your investigation reports consistently identify an employee error as the root cause, your investigation process is stopping too early. Human error is a starting point, not a conclusion. The question that matters is what conditions in your system made that error likely.

SIGN 04**Your written procedures don't match what actually happens in the field.**

Walk the job with your procedures in hand. If your workforce has developed informal workarounds to get the job done safely and efficiently, those workarounds are telling you something real about your operation. A written program that ignores them isn't protecting anyone.

SIGN 05

You learned about your last OSHA violation after it was cited.

A citation should never be a surprise. If your operation isn't doing regular self-audits against applicable OSHA standards, you are waiting for a regulator to find what your own team should have found first.

SIGN 07

Production pressure routinely overrides safety decisions in the field.

If your supervisors believe that stopping work for a safety concern will cost them their job or their standing with the company, whether or not anyone said so directly, your safety culture is broken at the structural level. No policy fixes this. Leadership behavior does.

SIGN 09

Your safety metrics only measure what went wrong.

Recordable incident rates, DART rates, and fatality counts are lagging indicators. They tell you what already happened. A functional safety program also tracks leading indicators: near-miss reports, safety observations, audit findings, and corrective action close-out rates. A dashboard built only on lagging numbers tells you how last year went, not how this one is going.

SIGN 06

Your safety program was built by someone who's never worked your operation.

A template safety program built for a generic oil and gas operator will miss the specific hazards, equipment, and operational rhythms of your site. If the person who wrote your program has never stood on your location, it reflects their assumptions more than it reflects your operation.

SIGN 08

You don't know which regulations actually apply to your operation.

OSHA, BSEE, DOT Pipeline, U.S. Coast Guard, and the Texas Railroad Commission can all have a claim on the same operation, and which ones apply depends on exactly what you do and where. If you're not certain which standards govern your specific operations, you have unmanaged compliance exposure.

SIGN 10

Nobody at the field level believes the safety program is there to protect them.

This is the most important sign on this list. If your workforce sees safety as something done to them rather than for them, if the JSA is a form to sign before work starts instead of a real conversation about hazards, the program exists on paper only. It won't be there when it matters.

The gaps in your program are real, and they carry regulatory, financial, and human cost. The Free Safety Gap Assessment is a 45-minute structured conversation designed to identify exactly where your program is exposed, at no cost and with no commitment required. Most operators leave with specific findings they didn't know existed.