

Laser safety: what the standard is actually asking for

A gap check for organizations that have named an LSO

Naming an LSO is straightforward, and frequently where it stops. What the standard asks for is not a person — it is a set of things that person is responsible for. The title is how you assign that responsibility. It is not a substitute for it.

This is a self-assessment, not a compliance audit, and it is not a substitute for reading the standard that applies to you. It is the set of questions we ask on a first walkthrough.

Classification and inventory

- ☐ **Every laser system in the facility is on a written inventory, including the ones in research, demonstration and storage.**

The systems that are missing are almost always the ones acquired outside purchasing.

- ☐ **Each system's classification is recorded, with the basis for it.**

A classification with no stated basis cannot be checked when the system changes.

- ☐ **The inventory has been reconciled against the rooms in the last twelve months.**

Walk it. Inventories drift faster than anyone expects.

Control measures

- ☐ **Control measures are documented per area, not per organization.**

A single site-wide statement cannot address a beam path that crosses a doorway in one room and not another.

- ☐ **The documented controls match what is physically installed today.**

This is the most common gap we find, and it is usually caused by an equipment change nobody linked back to the paperwork.

- ☐ **Where an administrative control substitutes for an engineering one, the reason is written down.**

An auditor will ask why. "It was easier" is an answer; it just needs to be a considered one.

- ☐ **Signage and labelling match the current classification.**

Check the rooms, not the file.

Training and records

- ☐ **Training is recorded by person, by content, and by date.**

Delivered is not the same as recorded. Only one of them survives scrutiny.

- ☐ **The records would still be findable if the person who keeps them left.**

A spreadsheet on one laptop is not a record system.

- ☐ **Anyone who can access a controlled area has training appropriate to it, including contractors and facilities staff.**

The gap is usually cleaners, maintenance or after-hours access.

- ☐ **Refresher intervals are stated and tracked.**

An untracked interval is an interval nobody is meeting.

The program behind the title

- ☐ **The LSO has stated authority to stop work, in writing.**

Responsibility without authority is a title.

- ☐ **There is a written procedure for incidents and near misses, and it has been used at least once.**

A procedure that has never been used is a procedure nobody remembers exists.

- ☐ **The program has a stated review cycle, and the last review is dated.**

Undated is indistinguishable from never.

- ☐ **If the named LSO left tomorrow, the program would survive.**

This is the test. If the honest answer is no, there is not a program — there is a careful person, and that is what the standard is trying to prevent you relying on.

Most organizations we walk into pass the first two sections and fail the last one. Competent people and no structure behind them is the normal state, not an unusual failure — and it is recoverable in weeks rather than months.

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