

GUIDANCE TO THE IMPLEMENTATION OF ISO 45001 OCCUPATIONAL HEALTH & SAFETY MANAGEMENT SYSTEM

The development of the ISO 45001 standard now finally brings the critical area of occupational health and safety management into the family of ISO standards. There has been a range of occupational health and safety standards being used across the world; the main one being OHSAS 18001, first developed and published in 1999.

After an extensive process of development starting mid-2013, ISO 45001 was published March 12 2018. The standard was developed with contributions from a large number of national experts and stakeholders.

ISO 45001 uses ISO's common framework for management system standards, which contains a unified high-level structure and common text and terminology.. This structure and contents is available from Annex SL of the ISO/IEC Directives, Part 1 Consolidated ISO Supplement – Procedures specific to ISO (<https://www.iso.org/sites/directives/2017/consolidated/index.xhtml>)

Annex SL states that all new and revised management system standards will use a consistent structure, common text and terminology, and this is enacted through "Appendix 2 – High level structure, identical core text, common terms and core definitions".

Several other ISO management system standards have already implemented the same structure – for example ISO 9001:2015, ISO 14001:2015 and ISO 27001:2013 (Information security). This common structure is beneficial for the users and other stakeholders.

From the publication date of ISO 45001 there will be a 3-year period to move from a OHSAS 18001 certificate to a ISO 45001 certificate. It is strongly recommended that you, as early as possible, start thinking about how it will impact you, and review what changes are needed.

This guidance document also includes "Our Key Transition Tips" after each main clause. These are designed to provide useful summary pointers for the transition, and also reflect the fact that many organizations may have already transitioned to ISO 9001:2015 and/or ISO 14001:2015. But if you are embarking on transition to an HLS structured ISO Standard for the first time the Our Transition Tips will still be very relevant and useful.

Layout of ISO 45001: 2018

1 Scope

2 Normative references

3 Terms and definitions

4 Context of the organization

4.1 Understanding the organization and its context

4.2 Understanding the needs and expectations of workers and other interested parties

4.3 Determining the scope of the OH&S management system

4.4 OH&S management system

5 Leadership and worker participation

5.1 Leadership and commitment

5.2 OH&S policy

5.3 Organizational roles, responsibilities and authorities

5.4 Consultation and participation of workers

6 Planning

6.1 Actions to address risks and opportunities

6.2 OH&S objectives and planning to achieve them

7 Support

7.1 Resources

7.2 Competence

7.3 Awareness

7.4 Communication

7.5 Documented information

8 Operation

8.1 Operational planning and control

8.2 Emergency preparedness and response

9 Performance evaluation

9.1 Monitoring, measurement, analysis and performance evaluation

9.2 Internal audit

9.3 Management review

10 Improvement

10.1 General

10.2 Incident, nonconformity and corrective action

10.3 Continual improvement

Note: For some clauses, there are additional sub-clauses which are not shown in this overview of the layout.

1. SCOPE

This section explains the scope of the standard – i.e. what it is for and what it encompasses. It introduces the requirements of an occupational health and safety management system which supports the fundamental aim of providing a safe and healthy workplace, together with the key intended outcomes of a management system including:

- enhancement of performance;
- conforming to compliance obligations;
- fulfilment of objectives

It also makes clear that any organization claiming compliance with the revised standard should have incorporated all requirements of the standard within their occupational health and safety management system.

2. NORMATIVE REFERENCES

There are no normative references associated with ISO 45001. The clause is included simply in order to maintain consistent alignment with the ISO High Level Structure (HLS).

3. TERMS AND DEFINITIONS

This clause lists the terms and definitions that apply to the standard – these are referenced where necessary back to other relevant ISO standards and guides (e.g. ISO Guide 73:2009 on Risk Management). The ISO 45001 standard extends the list of terms and definitions mandated under the HLS terms and definitions to cover the more specific terms and definitions associated with occupational health and safety management systems. These form a very useful reference point for a number of the newer terms and principles introduced in the new standard.

In addition to this Clause, Annex A of the standard is also a very useful guidance section for providing additional discussion and examples associated with key parts of the standard.

OUR KEY TRANSITION TIPS

- Clause 3 contains useful definitions which can assist in interpreting the standard - so use them!
- Annex A also contains useful and focused guidance to several of the clauses in ISO 45001.

4. CONTEXT OF THE ORGANIZATION

This clause sets out the requirements for an organization to take a high level overview of the business, considering the key internal and external factors which impact it (the 'whats'), and how it should respond to those issues in building, adapting and managing the OH&S management system.

4.1 UNDERSTANDING THE ORGANIZATION AND ITS CONTEXT

This clause requires the organization to consider a wide range of potential factors which can impact on the management system, in terms of its structure, scope, implementation and operation.

The areas for consideration quoted in the Annex A guidance of the standard are wide-ranging, including;

External Issues-

- Cultural, social, legal, financial, technological, economic and other market issues.
- Impacts of new competitors, contractors, suppliers and other providers.
- New technologies, laws and new knowledge on products and processes and their effect on OH&S.
- Key drivers and trends relevant to the particular industry or sector.
- Relationship with, and perceptions of external interested parties.

Internal Issues-

- Governance, organization, roles and responsibilities.
- Policies, objectives and strategies.
- Resources, knowledge and competence (e.g. capital, time, human resources, processes and technologies).
- Introduction of new products and services.
- Relationships with workforce, contractors and outsourced arrangements.
- Working time and working conditions.

4.2 UNDERSTANDING THE NEEDS AND EXPECTATIONS OF WORKERS AND OTHER INTERESTED PARTIES

This clause requires the organization to determine the needs and expectations of workers and “other interested parties”, which can be both internal and external. Workers are an obvious key interested party. In the standard “worker” is defined as “person performing work or work-related activities that are under the control of the organization”. It is not limited to own employees and covers both managerial and non-managerial positions. The term “stakeholder”, which many organizations will be more familiar with, is considered as synonymous and interchangeable term to Interested party in the standard, hence there is no need to consider them to be any different.

Other interested parties could include;

- Parent organizations
- Workers representatives, unions and employers’ organizations
- Contractors and outsourcing partners
- Customers
- Suppliers (of e.g. products and services)
- Legal and regulatory authorities
- Owners/Shareholders

- Visitors, relatives of workers, local community and neighbours of the organization
- Business associations, Non-Governmental

Organizations (NGOs) and media Whilst the consideration of context and interested parties needs to be relevant to the scope and the standard, the assessment needs to be appropriate and proportionate.

What is clear is that the outputs from clauses 4.1 and 4.2 are key inputs to the assessment and determination of risks and opportunities required in clause 6.

There are various methods and approaches which can be used to capture these inputs.

What is key to the success of this process is the involvement of personnel who have the higher level understanding of the business and also the key personnel with the in-depth knowledge of the critical issues and stakeholders and how this does or can impact the success of health and safety management within the organization. Some current examples of approaches and experiences include:

INTERNAL AND EXTERNAL ISSUES

- Key economic and market development which can impact the organization. Your organization is probably acutely aware of what is happening in its markets but this may be undertaken in a very ad-hoc way;
- Technological innovations and developments is also an area critical to your business success and is also probably being monitored and discussed at numerous levels;
- Regulatory developments - there is a whole range of external regulations being monitored by your organization. If you miss them then it could introduce risks to your business, or if you capture early intelligence on them you can more effectively manage any risks;
- Political and other instabilities – this could have potential to compromise health and safety standards and expectations;
- Organizational culture and attitudes – an effective and motivated workforce will give you positive impacts, and many organizations already consult with and promote participation from employees.

INTERNAL AND EXTERNAL PARTIES

- Stakeholder engagement exercises are already widely used to consult with interested parties and map out concerns and issues. More often used by larger organizations engaging with corporate social responsibility initiatives;
- Meetings and other interactions with regulators can encompass compliance and developing compliance against emerging requirements and standards;
- The consultation and participation of workers and feedback activities can be key factors of success for your management system and should be encouraged. This is a clear requirement in ISO 45001 (see clause 5.4).
- Supplier reviews and relationship management many organizations are trying to get much more mutual benefit from the supplier-client relationships which are critical to mutual success and cooperation with health and safety management.

Suppliers include providers of products and services, contractors and outsourcing partners;

- Client and customer reviews and relationship management - of course this is a fundamental pillar of all standards and a key to success.

When you reflect on how you capture key issues, and how many interested parties you already actively engage with, you may be pleasantly surprised. You may only engage with a limited number of internal and external parties, but now is the time to start thinking about whether that is enough, or whether you are missing some good opportunities.

There will be many ways in which to capture this – and hopefully some improved and new approaches will emerge as this part of the standard is considered.

Approaches could include;

- Summary information from the range of existing approaches used as listed above (e.g. a brief report),
- Information summarized as part of inputs to risk and opportunity registers already in use,
- Recorded in a simple spreadsheet,
- Logged and maintained in a database,
- Captured and recorded through key meetings.

These clauses are asking organizations to think clearly and logically about what can internally and externally affect their management systems, and to be in a position to show that this information is being monitored and reviewed. It also requires organizations to elevate the discussions to the highest levels of management, since capturing the above range of information is hard to achieve without the critical involvement of that senior management and those with extensive knowledge of the business and its key aspects.

4.3 DETERMINING THE SCOPE OF THE OH&S MANAGEMENT SYSTEM

This clause should be familiar to most organizations, since OHSAS 18001:2007 clause 4.1 clearly requires the definition of the scope

of the management system. For ISO 45001 the scoping requirements have become clearer, stronger and require the organization to consider the inputs from 4.1 and 4.2, along with the products and services being delivered.

These additional requirements should encourage a clearer and more logical approach to scoping, driven by external and internal requirements. It should not be used to exclude activities, processes or locations which have significance from a health and safety perspective and should not be used to avoid areas with clear compliance obligations.

The Annex A guidance uses the term ‘credibility’ in relation to the setting of the scope of an organization’s OH&S management systems. The scope shall be documented, as also required in OHSAS 18001.

These clearer requirements on scoping will hopefully improve the clarity in the thinking of organizations in scoping the management system.

Certification bodies will, as before, look at how an organization has defined its scope, ensuring that this is both appropriate and is reflected accurately by the management system and also in the scope of any certificate issued.

4.4 OH&S MANAGEMENT SYSTEM

This clause basically states that the organization needs to establish, implement, maintain and continually improve a management system. This indirectly drives the overall aims of the standard, namely- achievement of intended outcomes, including improving OH&S performance, fulfilling legal and other requirements, and achieving OH&S objectives.

This should also be familiar to organizations which implement management systems in order to deliver compliance and improvement.

This clause is more focused in requiring organizations fully understand the range of processes (defined as; “a set of interrelated or interacting activities which transforms inputs into outputs”) needed and their interaction.

For those who are committed to a management system which is at the core of your business then this will probably be an integral part of your management system. You may however need to review how effectively you connect those processes and understand the influence and impact of those processes on each other and on the business. This should also elevate the system in terms of its importance and value to the business, because it should drive more meaningful analysis of the key business processes and critical aspects of those processes. In practical terms, it will require an organization to more fully analyse its processes and ensure that there is good understanding of how they interact with each other - and not operate as isolated procedures without overlap.

OUR SUMMARY COMMENTS

Clause 4 introduces some significant innovations to the management system world. This could represent a challenge to some organizations who have not viewed the management system as essential to the business, focused as it is on raising management systems to a higher level and to be more central to the way an organization works – an approach which is entirely correct and logical.

The requirements to consider the context of the organization and the impact of issues and stakeholders drives the need for top management involvement in the process. And remember- the evaluation is not a one-off, it will need to be revisited and reviewed to reflect the changing landscape in which you manage your OH&S risks and opportunities.

OUR KEY TRANSITION TIPS

- Make sure to involve the key personnel in your organization to review context.
- Don't overcomplicate the process: the knowledge and awareness should be sitting around the table.
- Try to brainstorm as widely as possible to capture the full range of issues.
- Maintain and update the reviews to respond to key changes.

5. LEADERSHIP AND WORKER PARTICIPATION

This clause includes content which will be familiar from OHSAS 18001:2007 but also introduces some significant changes on overall leadership and commitment and the expectations for top management to engage more fully with the critical aspects of the OH&S management system. This is one of the consistent and excellent innovations of the HLS across all ISO management system standards.

5.1 LEADERSHIP AND COMMITMENT

This clause encompasses a range of key activities which top management need to “demonstrate leadership and commitment with respect to the management system”.

Therein lies one of the innovations delivered by the common HLS – top management must demonstrate leadership rather than just demonstrate commitment to it. The standard is driving the oversight of the management system to the highest level of management and making it a key component of the organization and its core business processes and activities.

It doesn't mean that the leadership has to regurgitate the policy or recite the objectives and targets – what it means is that an internal or external interested party should feel entitled to have a discussion with leadership about core and critical aspects of the business, because these are at the heart of the management system.

The ISO 45001 standard adds to the HLS content, with additional bullet points on top management to take responsibility and ownership for;

- Providing a safe working environment;
- Developing, leading and promoting a safety culture;
- Protecting workers from reprisals for reporting OH&S issues;
- Ensuring there is consultation and participation of workers;
- Considering the need for health and safety committees.

This sub-clause is a significant innovation to the structure of management systems, but should be viewed as a ‘positive challenge’ to organizations and an opportunity to enhance the role of the OH&S management system and place it at the centre of the business.

5.2 OH&S POLICY

The OH&S Policy is an important document because it acts as the driver for the organization.

It provides the direction and formally establishes goals and commitment. The new standard expands the required content of the OH&S policy.

Top management should ensure that the policy is appropriate and compatible with the strategic direction and not a bland statement that could apply to any business. It should provide clear direction to allow meaningful objectives to be set that align with it.

The ISO 45001 standard also adds to the HLS content with requirements to make clear commitment to eliminate hazards and OH&S risks, and a commitment to worker consultation and participation- see clause 5.4 for details around this latter point.

The policy needs to be communicated to all employees and they need to understand the part they have in its deployment. The policy must be documented and, as appropriate, available to interested parties.

5.3 ORGANIZATIONAL ROLES, RESPONSIBILITIES AND AUTHORITIES

For a system to function effectively, those involved need to be fully aware of what their role is. Top management must ensure that key responsibilities and authorities are clearly defined and that everybody involved understands their roles.

Defining roles is a function of planning, ensuring awareness can then be achieved through communication and training. It is common for organizations to use job descriptions or procedures to define responsibilities and authorities.

In ISO 45001 top management are more directly identified as being responsible for ensuring that these aspects of the system are properly assigned, communicated and understood.

Under the HLS the specific role of a Management Representative has been removed, but the standard still contains all the key activities and responsibilities of that previously identified role. These now lie more directly within the core structure of the organization - including top management. This has a positive implication for the OH&S management system- there is a clear expectation for consistent and appropriate ownership from top-to-bottom within an organization.

5.4 CONSULTATION AND PARTICIPATION OF WORKERS

This represents significant changes from OHSAS 18001:2007, and is a full extra sub-clause to the HLS. Clause 4.4.3.2 of OHSAS 18001:2007 covered this topic, but with ISO 45001 the significance and importance of consultation and participation is increased, and is referred to in numerous other clauses within the standard.

The concepts and principles of worker participation and consultation are a fundamental part of ISO 45001 in order to drive OH&S culture effectively from the top to the bottom of an organization. The activities, purpose and outcomes from

worker consultation and participation are defined and documented in detail- and form a pivotal element of the ISO 45001 standard.

In some countries, the existing legal requirements demand a certain level of participation and consultation with employees, and in addition there may also be worker organization and unions which drive a level of participation and consultation. But even in these geographies, the standard is challenging the leadership to embrace these key activities in order to drive behavioural and cultural changes and improvements.

Clause 5 contains much familiar content, but with greater emphasis on leadership and commitment, and the expectation that top management will be more actively engaged with the management system. With ISO 45001 the importance of worker consultation and participation is significant, and may challenge organizations.

OUR KEY TRANSITION TIPS

- This clause encompasses some key and critical changes to OH&S Management Systems.
- The key leadership requirements contain BOTH the HLS content AND several key additions for ISO 45001 on culture, protecting workers and supporting proper consultation and committees.
- Note also some additions to the HLS content relating to OH&S Policy.
- The new clause 5.4 on consultation and participation is extensive and detailed.

6. PLANNING

This clause represents significant changes to OHSAS 18001:2007 in a number of fundamental respects, as well as maintaining large elements of what is covered under clause 4.3 of OHSAS 18001:2007. Whilst OHSAS 18001:2007 already contains references to risk, the changes in ISO 45001 elevate this to a common core of the HLS and this has been adapted and extended in ISO 45001.

6.1 ACTIONS TO ADDRESS RISKS AND OPPORTUNITIES

In basic terms, this clause requires the organization to;

- Use the knowledge of the context (4.1 and 4.2) to determine the risks and opportunities that needs to be addressed in the management system to achieve the intended outcomes, prevent/reduce undesired effects and achieve improvements (6.1.1);
- Undertake hazard identification and assessment of risk and opportunities relating to activities, processes, emergency situations and other factors (6.1.2) (note that there is a detailed list indicating factors to take into account)
- Assess risks and opportunities in the case of planned changes (6.1.1) as part of the process for management of change (8.1.3);
- Determine the relevant legal and other requirements that apply (6.1.3) to the organization and risks and opportunities arising from these (6.1.1);

- Plan actions to address the risks and opportunities (6.1.2) and legal and other requirements (6.1.3) and to prepare for and respond to emergency situations (8.2).

This clause also makes clear reference to the classic hierarchy of controls for elimination of hazards and reduction of OH&S risks (detailed in clause 8.1.2)

The overall strength of this clause lies in both strengthening and broadening the principles of risk and opportunity within the OH&S management framework, and connecting this clearly to the processes defined under clause 4.

A well-established approach already implemented by many organizations for managing this range of inputs, risk analysis and prioritization is the use of risk registers, which if properly managed and implemented can effectively identify and assess risks and opportunities across a wide range of areas and issues. There will also be other approaches that can be used to capture results from the various relevant clauses in ISO 45001 such as the results from clause 4.1 and 4.2 and outputs from 6.1.1, 6.1.2, 6.1.3 and 6.1.4.

The depth and complexity of the approach will depend significantly on the size and complexity of the organization, as well as other factors which could include level of external regulation, existing requirements for public reporting, shareholder interests, public profile, numbers and types of customers, range and types of suppliers.

Hence there will be a range of approaches that will be appropriate for the wide spectrum of organizations.

6.2 OH&S OBJECTIVES AND PLANNING TO ACHIEVE THEM

This clause requires the organization to establish OH&S objectives and plans, ensuring that these are clear, measurable, monitored, communicated, updated and resourced.

As part of the planning process, top management needs to set OH&S objectives driven

by the outputs from the determination of risks and opportunities (i.e. the range of activities undertaken in 6.1), with the aim of delivering compliance, performance improvement and effective risk management. Objectives should be consistent with the OH&S Policy and be capable of being measured. Documented information needs to be kept in relation to objectives and there will need to be evidence regarding monitoring of achievement.

OUR KEY TRANSITION TIPS

- Similar to clause 4, this clause requires input from key personnel in your organization because it relates to key analysis and determination of risks and opportunities.
- There is no mandated approach! You can build on your existing approach to risk management and risk registers or adopt a different approach.

- Much of the content in clause 6 includes very similar content to OHSAS 18001:2007 on hazard identification, risk assessment, legal and other requirements. BUT! ISO 45001 broadens the analysis and raises the governance in the organization.

7. SUPPORT

This clause of ISO 45001 closely follows the HLS content and structure, and gathers together in one place all the areas relating to the “people, place and procedural” aspects of the management systems. The basic HLS clauses cover the following:

- 7.1 Resources
- 7.2 Competence
- 7.3 Awareness
- 7.4 Communication
- 7.5 Documented Information

7.1 RESOURCES

The main intention behind this general requirement is that the organization must determine and provide the resources needed for the establishment, implementation, maintenance and continual improvement of the health and safety management. Examples of resources include, human, infrastructure, technology and financial resources.

Whilst not contained in the ISO 45001 standard, ISO 9001:2015 contains a very interesting additional requirement termed “organizational knowledge”, which relates to ensuring that the organization understands internal and external knowledge needs and can demonstrate how this is managed. This could also include knowledge management relating to resources, and ensuring that there is effective succession planning for personnel, and processes for capturing individual and group knowledge. It isn't a documented requirement of ISO 45001 but it is relevant and useful as a general principle.

7.2 COMPETENCE

In order to determine competence, competence criteria need to be established for each function and role relevant to the health and safety management system. This can then be used to assess existing competence and determine future needs. Where criteria are not met, some action is required to fill the gap.

Training or reassignment may even be necessary. Retained documented information is required to be able to demonstrate competence. Recruitment and induction programmes, training plans, skills tests and staff appraisals often provide evidence of competence and their assessment. Competency requirements are often included in recruitment notices and job descriptions.

The standard is clear that documented information is required as evidence of competence.

7.3 AWARENESS

Personnel need to be made aware of the OH&S policy and objectives, how they contribute to the management system and performance, the hazards and risks associated with their work activities, incidents and outcomes from investigations, and ensuring that workers are empowered to remove themselves from dangerous situations and be able to take actions without adverse consequences.

The ISO 45001 standard is making some key additions to the HLS content by reiterating the importance of communication with workers, respecting the rights of workers to work safely, and building a positive and empowered working environment.

7.4 COMMUNICATION

Effective communication is essential for a management system. Top management need to ensure that mechanisms are in place to facilitate this. It should be recognized that communication is two-way and will not only need to cover what is required, but also what was achieved.

With ISO 45001 the importance of internal communications and external communications are emphasized, and the communications processes and communications made need to consider interested parties, diversity issues and legal and other requirements.

This sub clause also makes very clear the importance of the organization to "ensure that OH&S information to be communicated is consistent with information generated within the OH&S management system, and is reliable".

This is an excellent addition and consistent with other corporate reporting standards. It also emphasizes the need to plan and implement a process for communications along the familiar 'who, what, when, how' principles.

7.5 DOCUMENTED INFORMATION

This sub-clause closely follows the HLS, which encompasses a more logical broadening to encompass electronic and web-based media.

It is worth emphasizing here that the standard no longer specifies the need for documented procedures – it is up to the organization to decide what is needed. However, it does specify on a number of occasions the need to maintain or retain documented information, in order to give structure, clarity and evidence of the system being maintained and effective. The term "documented information" now replaces the previously used terms "documented procedure" and "records".

In most areas, this clause will not require significant changes. However, one relevant change to note is the explicit requirement in 7.5.3 to ensure adequate protection of documented information. This is of particular importance for information related to workers that are personal and confidential, such as HR- and medical information.

The changes introduced with the HLS in terms of not specifically requiring documented procedures is in reality not a significant issue – organizations still need to look at where documented information (e.g. processes, procedures, data, records) is critical for the management system and its effective operation.

OUR KEY TRANSITION TIPS

- This clause is not as significant in terms of changes as many of the other clauses BUT you should review the content and ensure that your current system encompasses the differences and changes introduced with ISO 45001:2018.
- Be confident that awareness is fully covered, including the support to workers in responding to serious risks and incidents.
- Make sure that adequate protection for relevant information is in place.

8. OPERATION

This clause basically represents the operational control and emergency planning parts of the current standard – the ‘engine house’ of production and control.

8.1 OPERATIONAL PLANNING AND CONTROL

The overall purpose of operational planning and control is to ensure that processes are in place to meet the health and safety management system requirements and to implement actions determined in clause 6.

This sub-clause has been significantly expanded compared with OHSAS 18001:2007. It contains much of the existing clause 4.4.6 and 4.4.7 content from OHSAS 18001:2007 and also some of the content from clause 4.3.1 on the hierarchy of controls to eliminate hazards and reduce risks. But in addition, there are now separate and more detailed sub-clauses covering management of change, procurement, outsourcing and contractors.

The overall effect of the new structure for clause 8.1 is to bring together the key operational control principles and requirements under one clause, raise the importance of several, and introduce updated terminology and focus to the standard. Sub-clause 8.1.1 covers the requirements to establish, maintain and control processes for the scope of activities undertaken, and to maintain and retain documented information.

Sub-clause 8.1.2 covers the health and safety hierarchy of control for eliminating hazards and reducing OH&S risks- the classic approach to management of health and safety.

Sub-clause 8.1.3 now separately covers management of change- a critical element of control and given an appropriate level of visibility in ISO 45001. It pulls together the key factors which may drive change and requires an organization to develop process(es) for managing change.

Sub-clause 8.1.4 covers procurement, which include outsourcing and contractors- basically requiring process(es) for effectively controlling those activities relating to other organizations providing services and activities. Useful guidance relating to this sub-clause can be found in the terms and definitions in clause 3 and the guidance in Annex A. Based on existing discussions around the sub-clause there is a risk that organizations may get too focused on which terms and categories apply to different interested parties involved with an organization. It is possible that more than one of the roles are applicable, together with both general and more specific processes. BUT- the critical activity an organization needs to undertake for ISO 45001 compliance is to fully understand how ANY interested party interfaces and interacts with that organization and how any issues, impacts, hazards and risks are managed effectively within the management system.

8.2 EMERGENCY PREPAREDNESS AND RESPONSE

This clause is clear in requiring the organization to establish, implement and maintain processes needed to handle potential emergency situations identified in 6.1.2.

Clause 8.2 requires to ensure:

- That the organization has a planned response to emergency situations, including provision of first aid;
- The organization responds to actual emergency situations;
- Periodic testing of any procedures, plans and response mechanisms;
- Periodic reviews and updates of procedures and plans based on testing and after actual emergency situations;
- Provision of relevant information to workers on duties and responsibilities;
- Provision of training for the planned response;
- Communicating relevant information to contractors, visitors and external agencies and authorities;
- Taking into account inputs and views from interested parties.

This content is very similar to OHSAS 18001:2007, but there is additional emphasis on the involvement of interested parties with respect to both needs and capabilities and also regarding necessary communications on emergency plans and processes.

Overall, clause 8 has been significantly expanded in ISO 45001, with added focus on management of change and on ensuring that the range of interactions and interfaces driven by procurement, outsourcing and contractors are fully understood and managed effectively.

OUR KEY TRANSITION TIPS

- Review the extended requirements to ensure compliance.
- Do not get overly concerned about how you categorize the range of organizations into the sub-clauses 8.1.4 Procurement, 8.1.4.2 Outsourcing and 8.1.4.3 Contractors (many will be covered by more than one of these subclauses). What is important is to assess how those organizations interact with you and how those interfaces need to be managed.

- Look carefully at how you are handling management of change; sub-clause 8.1.3 is stronger and more explicit in ISO 45001 and rightly so.
- For emergency preparedness make sure that you include all interested parties- internal and external.

9. PERFORMANCE EVALUATION

9.1 MONITORING, MEASUREMENT, ANALYSIS AND PERFORMANCE EVALUATION

This sub-clause encompasses two key areas:

- Monitoring, measurement, analysis and evaluation of health and safety performance and the effectiveness of the system;
- Evaluation of compliance with legal and other requirements.

The range of monitoring and measurement required needs to be determined for those processes and activities which relate to significant health and safety risks and objectives, key areas of operational control and processes, and also for evaluating the meeting of compliance obligations.

For the monitoring and measurement determined as required, the organization also needs to determine key criteria and requirements, including:

- Methods for monitoring, measurement, analysis and performance evaluation;
- Criteria (indicators) for evaluation of performance;
- When, where, how and by whom the monitoring, measurement, evaluation and analysis is carried out;
- Specification, management and maintenance of key monitoring equipment and data handling processes.

The output from these activities provide key inputs for a range of other elements of the health and safety management system, including management review, and in determining the internal and external communications required on the health and safety management system and its performance.

The other key aspect of this sub-clause is that the organization will need to demonstrate how it evaluates compliance with legal and other requirements.

Most organizations fulfil this clause via their internal audit processes, but other compliance audits, checks and reviews can be used.

The organization should define its processes for evaluating compliance with legal and other requirements and must maintain documented information relating to these activities. The process must cover:

- Frequency of evaluation
- Evaluation approach

- Maintain knowledge on compliance status

This area is similar to the requirements under OHSAS 18001:2007, but with clearer and more detailed requirements. As with OHSAS 18001:2007, this is not about reviewing which compliance obligations are applicable to the organization, it is about evaluating actual compliance with the range of requirements applicable to the organization.

9.2 INTERNAL AUDIT

Internal audits have always been a key element of OHSAS 18001 and other H&S management systems standards in helping to assess the effectiveness of the management system. An audit programme needs to be established to ensure that all processes are audited at the required frequency, the focus being on those most critical to the business. To ensure that internal audits are consistent and thorough, a clear objective and scope should be defined for each audit.

This will also assist with auditor selection to ensure objectivity and impartiality. To get the best results, auditors should have a working knowledge of what is to be audited, and management must act on audit results. This is often limited to corrective action relating to any nonconformities that are found, but there also needs to be consideration of underlying causes and more extensive actions to mitigate or eliminate risk. Follow up activities should be performed to ensure that the action taken as a result of an audit is effective.

9.3 MANAGEMENT REVIEW

The main aim of management review is to ensure the continuing suitability, adequacy and effectiveness of the health and safety management system. Only through conducting the review at sufficient intervals (remember, management review does not have to be just one meeting, held once per year), providing adequate information and ensuring the right people are involved can this aim be achieved.

The standard details the minimum inputs to the review process. Top management should also use the review as an opportunity to identify improvements that can be made and/or any changes required, including the resources needed.

The input to management review should include information on:

- Status of previous actions from management reviews;
- Changes in internal/external inputs, risks and opportunities and legal and other requirements;
- Achievement of health and safety objectives;
- Information on health and safety performance;
- Communications from external interested parties;
- Opportunities for continual improvement;
- Adequacy of resources for the health and safety management system.

The output from the management review should include any decisions and actions related to:

- Conclusions on the suitability, adequacy and effectiveness of the system;
- Continual improvement opportunities,
- Changes to the health and safety management system;
- Resources needed
- Actions needed (e.g. relating to objectives not achieved);
- Implications for the strategic direction of the organization.
- Documented information pertaining to the management review is required to be retained.

This clause is largely the same as OHSAS 18001:2007, but with some broader topics and alignment with the new language of risks and opportunities, and the context of the organization.

OUR KEY TRANSITION TIPS

- Make sure that you undertake sufficient internal audits to assess the effectiveness of the changes made to meet ISO 45001:2018.
- Make sure that you continue to maintain an effective overall internal audit plan.
- Review your approach to evaluation of compliance and ensure that it covers all key legal and other requirements.
- Review your management review processes and inputs and outputs to ensure that you meet the extended ISO 45001 requirements.

10. IMPROVEMENT

10.1 GENERAL

This states that the organization shall determine opportunities for improvement and implement necessary actions to achieve intended outcomes of the OH&S system.

10.2 INCIDENT, NONCONFORMITY AND CORRECTIVE ACTION

The main aim of the corrective action process is to eliminate the causes of actual problems to avoid recurrence of those problems. It is a reactive process, in that it is triggered after an undesired event (e.g. an accident). The process uses the principles of root cause analysis. A basic approach to problem solving is “cause” and “effect”, and it is the cause that needs to be eliminated. Action taken should be appropriate and proportionate to the impact of the nonconformity. As part of the corrective action process, the effectiveness of action taken must be checked to ensure it is effective.

For this clause on nonconformity and corrective action, much of the content is familiar and similar to OHSAS 18001:2007, including the addition of “incident” to the basic HLS terminology of “nonconformity and corrective action”. The term “preventive action” has now been completely deleted from the standard. This is because the new HLS is built on the fundamental principles of risk management, which embodies the need to identify risk and manage those risks, with the goal of

risk elimination. The overall approach is one of mitigating and where possible eliminating risk, with the use of corrective action to deal with the impacts of realized risks.

This clause is essentially very similar to clause 4.5.3 of OHSAS 18001:2007, but with greater emphasis of the risk concepts, and with additional reference to communicating and liaising with workers on actions, investigations and outcomes.

10.3 CONTINUAL IMPROVEMENT

This sub-clause of ISO 45001 effectively summarizes the key aim of an OH&S system: to continually improve the suitability, adequacy and effectiveness of the OH&S management system to enhance performance. This was also embodied in OHSAS 18001:2007 but is separately stated in ISO 45001. Improvement does not have to take place in all areas of the business at the same time.

This clause is another part of the standard where the importance of enhancing OH&S performance, promoting a OH&S culture, the participation of workers and the importance of communications are emphasized.

Focus should be relevant to risks and benefits. Improvement can be incremental (small changes) or breakthrough (new technology). Both methods will be used at some point in time.

OUR KEY TRANSITION TIPS

- Ensure that this clause is addressed for the critical new content on worker consultation and participation.
- As with other clauses this element of the standard challenges an organization to understand its safety culture and how effective that culture is.

Readers may please note that D. L. Shah Trust brings out two e-journals on a fortnightly basis. These are mailed to those persons or institutions who are desirous of receiving them:

These two e-journals are:

- 1. Safety Info**
- 2. Quality Info**

If you or your friends or colleagues wish to receive these journals, you may send us an email requesting for the same. There is no charge for these journals. Our e-mail address is:

dlshahtrust@yahoo.co.in

or

haritaneja@hotmail.com

or

dlshahtrust@gmail.com

You can also access these journals on our website: www.dlshahtrust.org

<p>Published by : D. L. Shah Trust, Room No. 16, 1st Floor, Gool Mansion, Homji Street, Mumbai 400 001 email: dlshahtrust@yahoo.co.in Ph: 022-22672041 Subscription: Free on request (soft copy only)</p>	<p>Edited by : Hari K Taneja, Trustee, D. L. Shah Trust email: dlshahtrust@gmail.com Phone: 022-2309 6529 Subscription: Free on request (soft copy only)</p>
---	---