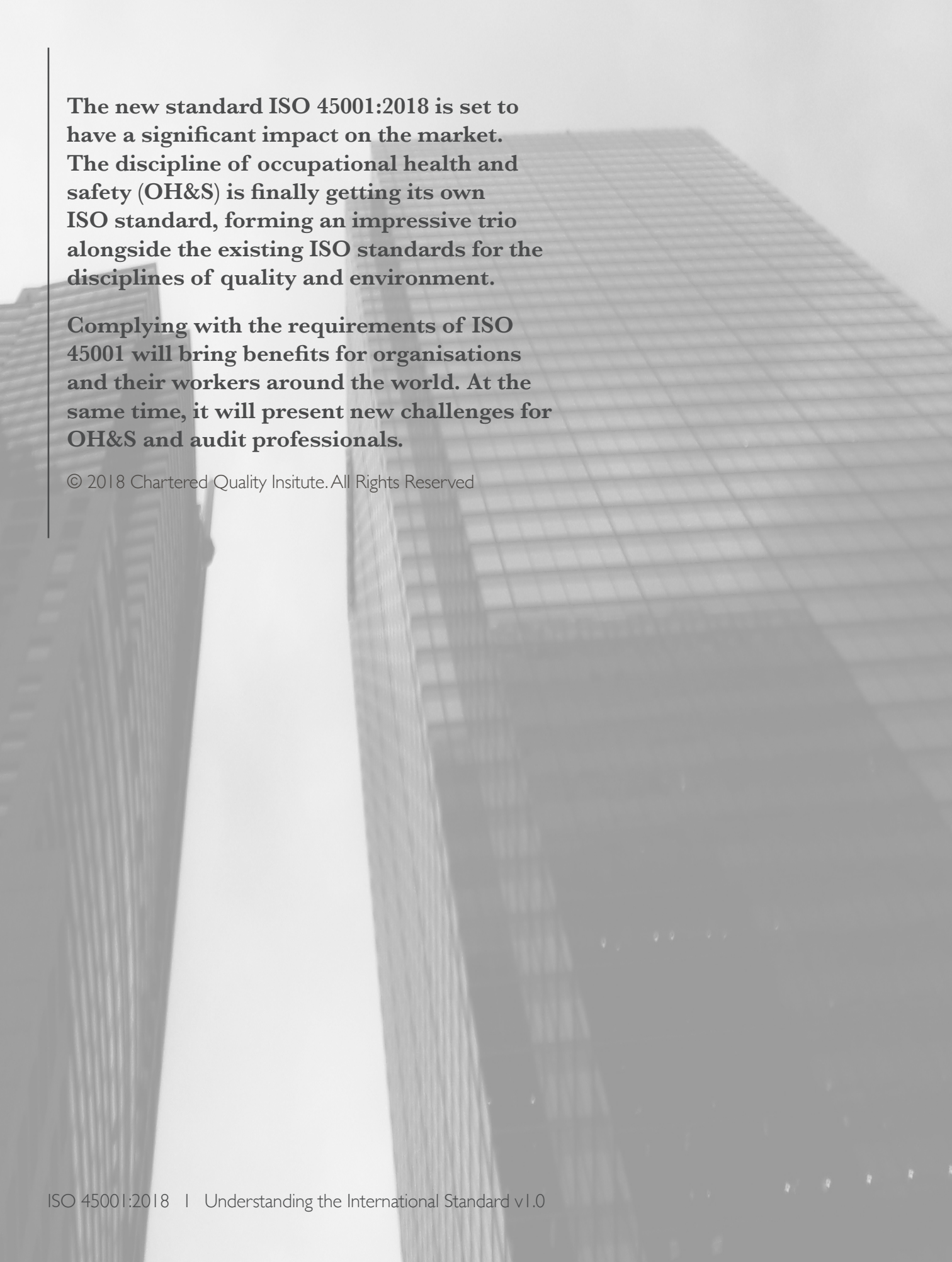# Report

CQI | IRCA

ISO 45001:2018
Understanding the International Standard

The new standard ISO 45001:2018 is set to have a significant impact on the market. The discipline of occupational health and safety (OH&S) is finally getting its own ISO standard, forming an impressive trio alongside the existing ISO standards for the disciplines of quality and environment.

Complying with the requirements of ISO 45001 will bring benefits for organisations and their workers around the world. At the same time, it will present new challenges for OH&S and audit professionals.

Contents

Introduction

Every year for the past 20 years, the International Organization for Standardization (ISO) has conducted a survey on the worldwide adoption of its management system standards.

The latest edition of this survey reveals growth across the board for all management system standards, with a total of 1.6 million certifications globally at the end of 2016. Of these, 1.1 million were for ISO 9001 (first published in 1987) and about 350,000 were for ISO 14001 (first published in 1996).

This report focuses on the new ISO 45001 standard on occupational health and safety management systems (referred to hereafter as OHSMS). This new standard has its origins in OHSAS 18001, which occupied a place in the trio of management systems that are widely used by organisations worldwide: quality, environment and occupational health and safety (OH&S).

OHSAS 18001 was first published in 1999 and revised in 2007 by the OHSAS Project Group, an international consortium of experts including representatives from various national standards bodies, academic institutions, and health and safety organisations.

If we compare the number of certifications to OHSAS 18001 with other ISO management system standards, it occupies third place, behind ISO 9001 and ISO 14001, and ahead of ISO/TS 16949 (automotive), ISO 22000 (food safety), ISO 13485 (medical devices) and ISO 50001 (energy).

At the end of 2015, 16 years after the publication of OHSAS 18001, approximately 160,000 certifications had been granted, according to data from the project group. In the same period of time, ISO 9001 achieved 500,000 certifications (by 2003), and ISO 14001 achieved 300,000 (by 2012).

These figures show that OHSAS 18001 was a great market success, even without being an ISO standard. The CQI now expect that the new ISO 45001 will grow from this excellent starting point, and help to bring about marked improvements in the management and care of the occupational health and safety of workers.

Purpose of this report

This report is intended to assist both CQI members and IRCA certificated auditors in preparing for the new standard – preparation that can and should begin now.

The new ISO 45001, building upon OHSAS 18001:2007, adopts Annex SL, providing a shared framework with other ISO standards. It also adds discipline-specific requirements which we believe will have a significant impact for organisations and OH&S and audit professionals.

The report is based on the text of the final draft document ISO/FDIS 45001. For simplicity we will refer to this simply as ISO 45001 hereafter. The CQI will revise and reissue this report should the FDIS ballot result in any substantive changes to the standard.

In section 3 of this report we include a message from David Smith, chair of the working group within the ISO/PC 283 project committee which developed the text of this new standard. David provides a first-hand insight into the process followed and hints at the key issues in the content of the standard.

Section 4 of the report comprises an executive summary providing a short overview of the standard, its application and how it compares with OHSAS 18001:2007.

In section 5, which makes up the bulk of this report, we examine the contents of ISO 45001, translating each clause into plain English and considering the implications from the perspective of those entrusted with overseeing the operation of OH&S management systems, or engaged in auditing them.

In section 6 we summarise the benefits we expect all interested parties will reap from the application of ISO 45001.

A three-year migration period is planned for those with certified OHSAS 18001 management systems wishing to gain certification to ISO 45001. This is no different from the transition process used for other standards which originate from previous non-ISO certifiable standards, e.g. ISO 27001 and ISO 50001.

David Smith | Photo credit: Chris Renton

Message from David Smith

Message from David Smith, chair of ISO/PC 283 (the committee that supervised the development of ISO 45001)

3.1 Birth of a new standard

The new ISO standard on occupational health and safety management has been more than four years in the making, and is eagerly awaited around the world. The final draft ISO 45001 was issued for ballot with a closing date in January 2018. A positive vote is anticipated after many meetings and consultation on the drafts issued after each stage.

It is perhaps surprising that we have had management system standards such as ISO 9001 and ISO 14001 for over 20 years and yet there has been no equivalent ISO document on the requirements for managing occupational health and safety (OH&S).

There have been national documents providing guidance, for example BS 8800 since 1996, and the guidance document produced by the UN's International Labour Organization (ILO) in 2001. The only requirement document that has had worldwide adoption is OHSAS 18001, produced by an international consortium of experts in 1999 and revised in 2007. Its status as a guidance document is well regarded, a fact borne out by the results of a 2011 survey showing over 90,000 organisations adopting it or its equivalent in 127 countries across 39 sectors. It is estimated that there are 160,000 users today. This shows that the risk-based approach of OHSAS 18001 is widely applicable, no matter the sector or country. So, why the delay to the development of an ISO document? There are many reasons for the apparent anomaly of there previously being no ISO standard on occupational health and safety:

- Different countries use many different regulatory approaches to OH&S, and there was concern about conflict with any ISO standard that might be developed. For example, the European Union has a risk-based approach as defined in the Framework Directive in 1989, but other countries take a purely compliance-driven approach.

- National standards have been produced and adopted in a number of countries, including Australia, New Zealand, the United States and Canada, where they are well established.

- Concern existed about the standard being used as a charter for consultants

- There are costs associated with certification

Despite these concerns, the project to develop this standard received a very positive vote in the ISO community in July 2013 and ISO/PC 283 was established to produce the standard. It has taken over four years, six project committee meetings and many more working group and task group meetings to achieve this goal. The OHSAS Project Group, which was formed by technical experts from around the world, has agreed that OHSAS 18001 will be withdrawn when ISO 45001 is published.

3.2 Overview of ISO 45001

- **ANNEX SL** The standard follows the Annex SL framework used for ISO 9001, ISO 14001, ISO 27001, ISO 23001 etc. This means that organisations with multiple systems who wish to integrate or align them, should find this to be an easier task. There are some challenges for those adopting any of the new management system standards with the Annex SL structure, and this is equally the case with ISO 45001. Those with a good OHSAS 18001 system will find the route to implementation less difficult and will find a lot of common ground, as risk-based thinking should already be a core activity.

- **LEADERSHIP and WORKER PARTICIPATION** (Clause 5) Top management are required to demonstrate that they engage in key OH&S management system activities. They are required to develop, lead and promote a culture of safety at work, and protect workers from reprisals when reporting incidents. This means that there is a need for top management to be actively involved, and demonstrate their commitment.

  The role of "management representative" has been removed, although it is a legal requirement in many countries including the UK. In the case of those adopting ISO 45001, all managers will need to be able to demonstrate their commitment to OH&S. ISO 45001 is not just about accidents in the workplace, and managers would do well to remember that issues such as stress can affect all parts of the organisation. This is not something the nominated management representative can necessarily take on board.

  The need to ensure integration of the requirements into business processes should mean that the "silo" approach of some organisations, whose OH&S management systems are totally independent, is a thing of the past.

- **CONTEXT** Two clauses (4.1 and 4.2) relate to the context of the organisation and the need to identify any external and internal issues that may affect the OH&S management system's ability to deliver its intended results. The impact of OH&S tragedies such as the 2013 factory collapse in Bangladesh, which killed more than 1,000 workers[1], the widespread use of "zero-hour" contracts and, in some cases, work in unacceptable work regimes, all create public concern and help drive the need for change. The risks identified in clauses 4.1. and 4.2 need to be considered and addressed in clause 6.

  Many organisations will have tackled or will be tackling the issue of context and interested party issues as part of the transition process to their new quality and environmental management systems, and the processes that they have used here should be helpful when implementing ISO 45001.

- **THE EXPECTATIONS OF "INTERESTED PARTIES" (OR STAKEHOLDERS)** Those individuals and organisations that can affect, be affected by, or perceive themselves to be affected by, the organisation's decisions or activities, must be considered.

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[1] http://www.bbc.co.uk/news/world-asia-22476774

- **WORKER** Everyone is classed as a worker. That includes top management and contractors. All are subject to risk when undertaking their day-to-day activities, and it is not acceptable to use external resources without ensuring that the requirements of the OH&S management system are met by contractors and their workers. The organisation's procurement processes are required to define and apply OH&S criteria for the selection of contractors and outsourcing.

- **CONSULTATION AND PARTICIPATION OF WORKERS** Unlike other standards, ISO 45001 focuses very much on worker involvement and requires a process for consultation and participation at all levels and functions within the organisation. The requirements emphasise that there should be consultation of non-managerial workers on a range of issues including the policy, setting objectives and determining applicable controls for outsourcing, procurement and contractors.

- **SCOPE** The boundaries for the scope of the system are determined by the organisation's context, recognising that it is not acceptable to subcontract your risk without exercising a duty of care (clause 4.3).

- **OH&S MANAGEMENT SYSTEM** While ISO 9001:2008 promoted the adoption of a process approach and OHSAS 18001 was based on "plan, do, check, act" (PDCA), there is recognition of both approaches in this document. Clause 4.4 requires the processes and their interactions to be determined within the OH&S management system.

- **RISK-BASED APPROACH** This means there is no reference to preventive action. The organisation must show that they have determined, considered and, where necessary, taken action to address any risks and opportunities that may affect (either positively or negatively) their OH&S management system's ability to deliver its intended outcomes.

- **IMPROVEMENT** ISO 45001 clause 10 recognises, among other things, that there is a need to improve and promote the culture and participation of workers in the actions required for continual improvement.

3.3 Challenges facing implementers and assessors

The real challenge comes in the requirements the standard places on leadership and worker participation. The organisation must ensure that the requirements of ISO 45001 are integrated into business processes, and that OH&S is not simply treated as a "silo" activity. Top management need to demonstrate commitment and ensure active worker participation in the management system.

The challenge for internal auditors is also significant as they may not have been accustomed to challenging senior managers' commitment in areas that are not directly operational. How many would go to senior personnel in finance, procurement or HR and ask about how they contribute to occupational health and safety?

Those who are external auditors are also challenged to establish that there are adequate arrangements for worker involvement and that occupational health issues form a significant part of an organisation's arrangements for managing OH&S.

Executive summary

4.1 Development of ISO 45001

The CQI has closely followed the work of the working group within ISO/PC 283, the ISO committee responsible for producing ISO 45001. Accordingly we have a specific insight into not only the contents of the new version but also the intent behind the content.

ISO 45001:2018 is due to be published on 12 March 2018.

The new standard ISO 45001 was drafted from the text of OHSAS 18001, which provided a solid starting point, taking into consideration the uptake it has had since it was first issued in 1999. The guidance contained in documents issued by the UN's International Labour Organization (ILO) was also a key input for the development of this new ISO standard.

Those leading, managing and auditing OH&S management systems will probably need to revise their current thinking and work practices in a number of ways in order to maintain organisational compliance and, most importantly, to reap the benefits of an effective OHSMS.

4.2 Generic management systems and their impact on standard users

The requirements incorporated into ISO 45001 can essentially be divided into two areas:

1. Those that have arisen as a result of the adoption of Annex SL as the basis for the standard, mainly defining the overall structure, terms and generic text which are common to ISO management system standards while not discipline-specific.

2. Those that have arisen as a result of the work of ISO/PC 283 that complements Annex SL with issues specific to the OH&S discipline.

Note that these two differing origins of the requirements cannot be seen in the text of the standard, since the same font and format is used throughout the document.

In the preface to the CQI briefing note on Annex SL, we present an introduction to Annex SL. Its adoption has implications for all those using ISO management system standards, whether standards writers, organisations, auditors or training providers.

Standards writers

Annex SL was developed to ensure that all future ISO management system standards would share a common format, core definitions and generic text irrespective of the specific discipline to which they relate.

With the generic requirements being prescribed by Annex SL, standard writers of the different ISO technical committees can now concentrate most of their efforts on developing the discipline-specific requirements only.

Organisations

Organisations seeking to introduce multiple management systems (e.g. OH&S management, environment management, energy management, quality management etc.) will have a smoother integration because the structure, core definitions and the generic text of the applicable standards are identical. This will simplify both the initial implementation and the ongoing maintenance and auditing of such systems.

This is the case for many organisations that enter the OHSMS world after having implemented quality or environment management systems that meet ISO 9001:2015 and ISO 14001:2015 requirements.

Nevertheless, organisations will be required to address new issues like the current OH&S culture and the participation and consultation of workers in the implementation and maintenance of the OHSMS at both a strategic and operational level. The involvement of everyone connected with the OHSMS, including those operating at the most senior levels, will come under increased scrutiny.

Since culture change can be notoriously difficult to achieve, the CQI have taken the position that ISO 45001 represents a significant step towards more efficient OH&S management systems and more integrated management systems generally.

Auditors

For management system auditors, the adoption of Annex SL means that in a combined audit, there is a generic set of requirements that can be audited simultaneously, irrespective of the disciplines within the audit scope.

Training providers

Many CQI Approved Training Partners have adopted a modular approach when designing auditor transition training courses. We expect that they will follow this scheme in the case of OHSMS audit courses, as well as revising and reissuing their Foundation, Internal Auditor, Auditor/Lead Auditor and Auditor Conversion courses after publication of the new ISO 45001 standard. Migration training will be valid until the withdrawal of OHSAS 18001.

4.3 OH&S-specific requirements

The main OH&S-specific additions to the basic Annex SL requirements are related to:

- participation and consultation of workers

- identification of applicable legislation and regular verification of compliance

- identification and evaluation of OH&S hazards

- internal and external communication

- operational control of hazards and management of change

- control of outsourcing, procurement and contractors

- emergency preparedness and response

- continual improvement of the organisation's OH&S performance

Most of these elements were part of OHSAS 18001. In ISO 45001 they have been revised and upgraded to fit into a more strategically positioned management system.

4.4 Summary of principal changes: Moving from OHSAS 18001:2007 to ISO 45001:2018

- **CONTEXT (Clause 4)** Organisations are required to identify any external and internal issues that may affect the ability of their OHSMS to deliver its intended outcomes. These outcomes are the continual improvement of OH&S performance, fulfilment of legal and other requirements, and achievement of OH&S objectives.

  Organisations are also required to determine the relevant needs and expectations of their relevant interested parties – i.e. those individuals and organisations that can affect, be affected by, or perceive themselves to be affected by, organisations' decisions or activities. Obviously, workers are the key interested party.

- **LEADERSHIP AND WORKER PARTICIPATION** Top management are required to demonstrate that they engage in key OHSMS activities, as opposed to simply ensuring that these activities occur. This means that there is a need for top management to be seen by all workers as actively involved in the operation of the OHSMS and as accountable for its results.

  The removal of the need for the role of "management representative" reinforces the requirement to make the OHSMS an intrinsic part of strategic and operational business as usual by all levels of management, rather than it being treated as an independent system in its own right, with its own specific management structure and processes.

As the workers are the key interested party who will need to be fully engaged by the OHSMS, the new standard requires organisations to establish, implement and maintain processes for consultation and participation of workers (and where they exist, workers' representatives) at all applicable levels and functions in the development, planning, implementation, performance evaluation and actions for improvement of the OHSMS.

"There is a need for top management to be seen by all workers as actively involved in the operation of the OHSMS and as accountable for its results"

- **RISK-BASED THINKING** (Clause 6) Organisations must demonstrate that they have determined, considered and, where deemed necessary, taken action to address any risks and opportunities that may affect (either positively or negatively) the ability of their OH&S management system to deliver its intended outcomes. These risks can be categorised in two levels: a) policy level, usually managed by the top management and related to the organisation's strategic planning and views, and b) operational level, which are those directly related to the workers' operational health and safety, and already addressed by OHSAS 18001.

  While references to "preventive action" no longer exist, the core concept of identifying and addressing potential sources of harm very much remains.

- **COMMUNICATION** (Clause 7) Communication with interested parties plays an important role in an effective OHSMS. Organisations need to be sure that the information provided is consistent with the information generated within the OHSMS, i.e. that it is accurate, timely and properly directed.

- **OPERATIONS** (Clause 8) Organisations need to operate safe processes by a) managing temporary and permanent changes under controlled conditions, b) ensuring that outsourced processes are controlled, c) controlling the procurement of products and services, and d) ensuring that contractors and their workers meet the requirements of the OHSMS.

- **IMPROVEMENT** (Clause 10) Improving the organisation's OH&S performance and the OH&S management system (as two separate issues) was already required by OHSAS 18001. In ISO 45001, those requirements are stressed in several clauses in the standard as one of the "expected outcomes" of the OHSMS.

- **TERMINOLOGY** (Clause 3) This clause contains the terms and definitions used in the standard, irrespective of whether they come from Annex SL or were added by the project committee ISO/PC 283. The new standard contains many notes for clarification of the context for terms and definitions.

- **ANNEXES** ISO 45001 has an informative annex that provides clause-based guidance on the use of the standard, a bibliography and an alphabetical index of terms.

- **DOCUMENTED INFORMATION** References to requirements for documents and records have been replaced by the term "documented information", which has to be "maintained" in the case of documents and "retained" in the case of records. Control of documented information continues to be a requirement.

- **CLARITY** There has been a conscious attempt to revisit the wording of the standard with a view to making the requirements easier to understand and to aid its translation.

4.5 Changes you do not need to make to existing OH&S management systems

Organisations that are complying with the requirements of OHSAS 18001:2007, do not need to:

- **REMOVE** any existing management representative function. While there is no requirement in ISO 45001 for a management representative, this does not prevent organisations from choosing to retain this role if they wish. It should be noted that some of the responsibilities traditionally assigned to the management representative by top management will now need to be undertaken directly by top management themselves.

- **ELIMINATE** any existing manuals and documented procedures. While ISO 45001 has no requirement for organisations to have and use either an OH&S manual or documented procedures, if this documentation is in place, needed and working well, there is no need for it to be withdrawn, although it will have to be aligned with new requirements.

- **RENUMBER OR RENAME** existing OHSMS documentation to correspond to the new clause references. Although organisations may choose to carry out a renumbering or renaming exercise, it is up to them to determine whether the benefits gained from this will exceed the effort involved.

- **RESTRUCTURE** their management systems to follow the sequence of requirements as set out in the standard. Providing all of the requirements contained in the standard are met, the organisation's OHSMS will be compliant.

- **REFRESH** existing practices to use the new terms and definitions contained in ISO 45001. Once again, organisations are free to make the judgement as to whether this effort would be worthwhile. If organisations are more comfortable using their own terminology, e.g. "records" instead of "documented information", or "supplier" rather than "external provider", then this is perfectly acceptable.

Clause-by-clause evaluation

The interpretations of requirements contained within this document are those of the CQI – other organisations may interpret the requirements of ISO 45001 differently.

As such, this document should not be viewed as a definitive reference source for this international standard; indeed, only documentation published by ISO/PC 283 can fulfil this purpose.

Neither the CQI nor IRCA are permitted to reproduce the exact wording of the standard due to copyright restrictions. Those individuals who need access to the exact wording should make their own arrangements to source the standard from a legitimate supplier.

This section of the report aims to:

- **simplify** the requirements of each clause of ISO 45001 into language that is easier to understand;

- **identify** the implications of the requirement for OH&S professionals (OH&S managers, directors, system implementers);

- **identify** the implications of the requirement for audit professionals

Introduction

This section reminds us that organisations are responsible for the occupational health and safety of workers and others who can be affected by their activities. This responsibility includes promoting and protecting their physical and mental health.

The adoption of an OHSMS is intended to enable organisations to provide safe and healthy workplaces, prevent work-related injury and ill health of workers, and continually improve OH&S performance.

The definition of "workers" is wide-ranging. It includes employees of the organisation (part-time, full-time, temporary, on the payroll or under other work-related relationships) but also contractors' workers and any other person within the organisation's control, such as workers operating outsourced processes either onsite or offsite.

Implementing an OHSMS conforming to ISO 45001 enables organisations to manage their OH&S risks and improve their OH&S performance. An OH&S management system can also help organisations fulfil legal and other requirements.

The key success factor of an effective OHSMS is the participation of and consultation with all workers, since they care about their own health and safety during work. Commitment at all levels of an organisation can realise benefits from opportunities and can help to eliminate or mitigate the impact of hazards.

The implementation of an OHSMS is a strategic and operational decision for organisations. The success of an OH&S management system depends on leadership, commitment and participation from all levels and functions of the organisation.

Top management input is essential to achieving these benefits. Managers must recognise their role in effectively addressing OH&S risks and opportunities, in integrating OH&S management into the organisation's business processes, strategic direction and decision-making and, most of all, by incorporating sound OH&S governance into the organisation's overall management system.

"Commitment at all levels of an organisation can realise benefits from opportunities and can help to eliminate or mitigate the impact of hazards"

Users of the standards must appreciate that the adoption of ISO 45001 does not necessarily guarantee a specific level of OH&S performance. Two organisations with similar activities may have different interested parties, may face different external and internal issues, may start implementing their OH&S from different baselines and may wish to improve at different rates, and yet both can conform to the requirements of the standard.

Clauses 1 to 3 of the standard set out its scope of application, normative references and terms and definitions, while clauses 4 to 10 contain the requirements to be met during the implementation of the OHSMS and during its conformity assessment. The terms and definitions in clause 3 are arranged in conceptual order, while an alphabetical index is provided at the end of the standard.

Clause 4 sets the context for the OHSMS itself and its constraints (internal and external issues and the requirements of interested parties) while clause 5 defines the leadership "engine" which drives the "plan, do, check, act" (PDCA) cycle embodied in the framework of the standard.

Clauses 6 to 10 follow the PDCA cycle. The relationship can be seen as follows:

- **Plan** in clause 6

- **Do** in clauses 7 and 8

- **Check** in clause 9

- **Act** (for improvement) in clause 10

In addition to the 10 main clauses, there is one annex that provides guidance which elaborates on the intent of the requirements of the standard; there is a bibliography, which makes reference to other related ISO standards and ILO documents, followed by the alphabetic index of terms.

In the standard, the following terms are used:

a) "shall" indicates a requirement

b) "should" indicates a recommendation

c) "may" indicates a permission

d) "can" indicates a possibility or a capability

Note that a) is mandatory while b), c) and d) are optional at the discretion of the user.

In many sections a note is included for guidance in understanding or clarifying the associated requirement. These notes are not, in themselves, requirements. Some entries in clause 3 provide additional information that supplements the terminology and can contain provisions relating to the use of a term.

Any organisation that wishes to demonstrate conformity to the standard can make a self-determination and self-declaration, request interested parties to confirm its conformance, have its self-declaration reviewed by third parties, or get its OHSMS certified by independent third parties, usually accredited certification bodies.

1 Scope

This section lays down the foundation of an OH&S management system to enable an organisation to provide workers with safe and healthy workplaces by preventing work-related injuries and ill health as well as improving its OH&S performance.

To achieve this, the standard establishes the requirements of an OHSMS; with "expected outcomes": a) enhancement of OH&S performance, b) fulfilment of compliance obligations and c) achievement of OH&S objectives. Organisations can set additional intended outcomes for their OH&S if they so wish.

These "intended outcomes" are referenced in key clauses of the standard:

• in 4.1, where the focus is on issues that affect the organisation's ability to achieve its intended outcomes

• in 5.1, where top management is charged with the responsibility and accountability to ensure that the OH&S achieves the organisation's intended outcomes

• in 6.1, where the risks and opportunities that need to be addressed include those that give assurance that the OH&S can achieve the organisation's intended outcomes

• in 10.1, where the improvement actions include those necessary to achieve the organisation's intended outcomes.

This standard is applicable to organisations of any size and type, engaged in any kind of activity. However, it does not state any specific criteria for OH&S performance, does not prescribe any specific format of the

OHSMS, and does not address issues like product safety, property damage and environmental impact in as far as they do not affect the occupational health and safety of workers.

This clause clarifies that the standard can be used in whole or in part to improve OH&S management. However, claims of conformity with the standard can only be made when all its requirements are incorporated into the OHSMS. In other words, exclusions are not permitted.

2 Normative references

There are no normative references applicable to this standard; there is no other standard or document that contains requirements in addition to those included in the main text (clauses 4 to 10).

3 Terms and definitions

This section contains the common terms and core definitions included in Annex SL, plus those terms and definitions added to complement the OH&S-specific text drafted by the working group ISO/PC 283/WG1.

There are some terms that are self-explanatory and can be used straightforwardly. However, there are a few whose definitions need to be more carefully considered in order to fully understand the requirements in which they are used. Key terms that deserve to be analysed in detail in order to fully understand the requirements in section 4 to 10 are: worker, interested party, participation, consultation, workplace, injury and ill health, hazard, risk, OH&S risk, OH&S performance and incident.

Where the standard makes reference to "workers and their representatives", the intention is that, where representatives exist, they should be consulted as one of the means to achieving appropriate worker participation. In some instances it may be appropriate to involve all workers (managerial and non-managerial as much as practicable) and all representatives. In the case of incidents that occurred in a certain area of an organisation, only workers of that area should participate in the investigation, together with their representative, if appropriate.

Annex A.3 clarifies the meaning given to common language terms in order to ensure their correct interpretation within the context of ISO 45001. For example:
- continual / continuous

- consider / take into account

- appropriate / applicable

- interested party / stakeholder

- ensure

- documented information

4 Context of the organisation

4.1 Understanding the organisation and its context

» **INTERPRETATION**

ISO 45001 is focused on workers' operational health and safety (see definition 3.3 to fully grasp the scope of this term).

However, addressing everyday legal and operational OH&S issues may not be enough to ensure that the OHSMS will achieve its intended outcomes (see section 1). The standard requires organisations to move beyond this, and to identify, review and keep updated, internal and external issues that are relevant to the organisation's purpose, and that may affect their ability to achieve the OHSMS intended outcomes.

External issues may, for example, be related to politics, economics, society, technology, finance, legislation, natural surroundings, that can represent a threat or opportunity to the effective operation of the organisation's OHSMS.

Internal issues may be related to governance, strategies, culture, activities, products and services, workers' participation and consultation, capabilities, or other issues that might constitute a strength or weakness of the organisation's OHSMS.

> **"OH&S professionals are used to mainly dealing with everyday operational issues. Now, they will need to embrace a wider picture, with OH&S matters embedded into the organisation's business environment"**

The standard does not prescribe who within an organisation will be responsible for complying with this requirement. Nevertheless, it is highly probable that top management will be closely involved, considering that these issues are likely to be related to strategic and business process elements of the organisation.

The standard does not require organisations to document this information, however it seems to be reasonable to expect that all organisations, except those that are very small, will choose to maintain this information in documented form.

Some of the issues determined by the organisation may result in risks and opportunities to the organisation's OHSMS. In Section 6.1, organisations are required to determine which ones pose a potential risk or opportunity and to take action to address them, including maintaining documented information.

» Implications for OH&S professionals

Most organisations should already be successfully monitoring internal and external issues that have the potential to affect not only their OHSMS but the whole organisation.

The standard requires the organisation to use this knowledge to establish the scope of its OHSMS, to design, implement and continually improve it, and to determine risks and opportunities associated with occupational health and safety.

OH&S professionals are used to mainly dealing with everyday operational issues. Now, they will need to embrace a wider picture, with OH&S matters embedded into the organisation's business environment. They will likely be required to share their knowledge and experience with top management. In many organisations, the dialogue between OH&S professionals and top management is mainly focused on operational aspects of OH&S. This requirement (and others in the standard) represents a good opportunity for OH&S professionals to expand the dialogue with top management to cover strategic matters, if such exchanges do not already take place.

» Implications for audit professionals

Auditors will need to allow additional time to prepare for audits in order to establish their understanding of the context in which audited organisations operate. The preparation for the audit may include a thorough search of all available information on the organisation itself (e.g. from the organisation's website) and on the industry sector (e.g. information on industry trends, the state of the global market and the natural environment).

Auditors will also need to understand the external and internal issues typically experienced in organisations, and must be ready and able to challenge top management if they believe an organisation's interpretation of its context is deficient or incorrect. Like OH&S professionals, auditors will have to be aware of generic issues related to the life of organisations, and not limit their interactions with top management to OH&S issues. A thorough familiarity with the organisation's sector (e.g. manufacturing, construction, services) and processes, will be vital.

Auditors will be required to audit this requirement with the top management. This represents quite a challenge to the auditor skillset; auditing this requirement only with middle managers or with the OH&S manager will probably not produce the desired results.

Evidence needs to be obtained to provide assurance that organisations are reviewing and regularly updating the external and internal issues that they have identified. If the organisation decides not to maintain documented information on the relevant issues, this will pose a challenge to auditors, and face-to-face interviews will be essential.

4.2 Understanding the needs and expectations of workers and interested parties

» **INTERPRETATION**

The first step is to determine the organisation's "interested parties" as defined in clause 3.2 of the standard.

"Workers" are the key interested party and the main focus of ISO 45001. Examples of other interested parties are regulatory authorities, suppliers, contractors, subcontractors, workers representatives, trade unions, owners, customers, medical and other community services, and NGOs.

The second step is to determine which of those interested parties are "relevant" to the OHSMS.

The third step is to determine which needs and expectations of those "relevant" interested parties are "relevant" to the OHSMS.

This clause requires organisations to determine, review and regularly monitor information on the "relevant" needs and expectations of "relevant" interested parties. The term "relevant" has to be read as "pertinent to the OH&S", and it is the organisation, not the auditor, who decides what is relevant and what is not.

These relevant needs and expectations come in two types:

a) those that are obligatory (e.g. law, regulations, international treaties accepted locally, mandates from upper levels of the organisation)

b) those that an organisation voluntarily agrees to comply with (e.g. the organisation's own standards, industry standards, contracts, agreements with workers or their representatives, codes of practice)

All these needs and expectations are called "legal requirements and other requirements". The notes in clause 3.9 of the standard are particularly informative on this point.

Some of these requirements may result in risks and opportunities to organisations. In Section 6.1, organisations are required to determine which requirements pose a potential risk or opportunity and to take action to address them, including maintaining documented information.

As in clause 4.1, the standard does not require organisations to keep contextual information documented. However it seems to be reasonable to expect that all organisations, except very small ones, will choose to maintain this information in documented form.

» Implications for OH&S professionals

It is easy to imagine that ISO 45001, being an OH&S-related standard, will establish requirements mainly affecting workers and OH&S professionals. But as in clause 4.1, top management need to play a key role.

OH&S professionals can assist management by playing the role of facilitator or providing support. This type of information can only be generated by top management when deciding what needs and expectation are relevant to the organisation.

Note that the standard does not require all requirements of all interested parties to be met. The idea is that meeting the "relevant" requirements of the "relevant" interested parties (i.e. those that pose unacceptable risks or present opportunities) will allow the organisation to be in a better position to ensure that the OHSMS produces the expected outcomes (see Section 1).

» Implications for audit professionals

The comments on implication for audit professionals in clause 4.1 are fully applicable to clause 4.2 also.

4.3 Determining the scope of the OHSMS

» INTERPRETATION

When designing the OHSMS the organisation has to define its scope, which sets its boundaries, its organisational functions, and the activities, products and services within the organisation's control or influence that can have an impact on its OH&S performance.

When defining the scope of its OHSMS, an organisation needs to:

a) consider the internal and external issues it faces as part of the context

a) take into account the legal requirements and other requirements

a) take into account planned or performed work-related activities

In order to interpret correctly the text of the paragraph above, Annex A.3 clarifies that the term "consider" means that it is necessary to think about the issue but it can be excluded; on the other hand "take into account" means that it is necessary to think about the issue, and it cannot be excluded.

The scope of the OHSMS has to be documented.

» Implications for OH&S professionals

An organisation has the freedom to define its own OHSMS boundaries. It may choose to develop an OHSMS for the entire organisation or for some specific part of the organisation, but only if the top management of that part has the authority and resource to implement the OHSMS.

"The credibility of an organisation's OHSMS depends, among other factors, on the choice of the OHSMS scope"

The credibility of an organisation's OHSMS depends, among other factors, on the choice of the OHSMS scope. In order not to mislead interested parties, the scope should not exclude activities, products and services that have a significant impact on the OH&S performance or that are related to legal requirements or other requirements.

As was the case with clauses 4.1 and 4.2, the definition of the scope should be decided by top management. OH&S professionals may assist them in this, but it is clearly a strategic decision of the organisation.

» Implications for audit professionals

Auditors must gather evidence that the scope has been correctly defined considering the organisation's context and taking into account the applicable legal and other requirements and the organisation's activities, products and services.

Auditors will also have to evaluate the accuracy of the scope as derived by the organisation and determine if, as defined, the scope may mislead interested parties on what is and is not covered by the OHSMS.

Auditors will also need to verify that the organisation's scope is maintained as documented information.

4.4 OH&S management system

» INTERPRETATION

Clause 4.4 sets out high-level generic requirements for the OHSMS. Organisations have to establish a management system that complies with all requirements of ISO 45001. Once established, the OHSMS needs to be implemented, maintained and continually improved.

When developing the management system, the organisation has to determine the processes needed, and how they interact. This requirement does not necessarily imply that a "process approach" (as per ISO 9001) has to be adopted.

It is also expected that the processes included in the OHSMS will, whenever practicable, be fully integrated into the business processes of the organisation.

When developing the OHSMS, and once all the processes needed have been identified, the organisation has to determine which ones, if any, will be outsourced. The outsourced processes will have to remain under the control of the OHSMS, as established in clause 8.1. An outsourced process may be an operational activity (e.g. plating metallic parts or maintaining the infrastructure) or a corporate process (e.g. purchasing, human resources or legal issues).

» **Implications for OH&S professionals**

The organisation has the authority to decide how it will meet the requirements in clause 4.4.

The OH&S professionals will have a key role in the development of the OHSMS. To do so, they will have to thoroughly research the organisation, and understand all its processes and their interactions. In the case of an OHSMS applied to a specific part of an organisation, they will have to identify which policies and processes applied in other parts of the organisation may need to be incorporated into the OHSMS being developed.

» **Implications for audit professionals**

This clause contains high-level requirements that span across all other clauses of the standard. Auditors will need to take this it into account when auditing all other requirements and will then need to make a high-level evaluation as to the organisation's degree of conformance with all the requirements in the standard.

A nonconformity against this requirement would only be possible if auditors find evidence of issues that span most of the OHSMS processes, and raise serious doubt as to whether a viable OHSMS is in existence.

5 Leadership and worker participation

5.1 Leadership and commitment

» **INTERPRETATION**

This is a key clause and is fundamental to the whole standard. If it is not followed in its basic and profound meaning, the whole management system may still achieve some good results, but fail to reach its full potential.

With reference to the OH&S management system, top management must demonstrate leadership and commitment to all persons in the organisation, as well as to other interested parties such as contractors and customers. This is something that top management must demonstrate in tangible ways.

This starts with them accepting accountability for the effectiveness of the OHSMS, being involved where and when necessary, communicating what is necessary and taking action accordingly.

They must ensure that the OH&S policy and objectives are consistent with the organisation's overall strategic direction and the context in which the organisation is operating.

They must use their authority to ensure that the OHSMS objectives are achieved. In addition, top management must ensure that the OH&S policy is communicated, understood and applied across the organisation and that the OHSMS achieves the expected outcomes.

Top management must also ensure that the OHSMS requirements are integral to the organisation's business processes and that resources are available for its effective operation.

Top management must provide leadership to those who contribute to the effective operation of the system. They must also encourage leadership in OH&S in other management roles.

In addition, top management must ensure the establishment and implementation of processes for consultation and participation of workers at all levels and functions.

» Implications for OH&S professionals

The emphasis on "leadership and commitment" is perhaps the most significant requirement and fundamental change contained in ISO 45001, although the actual impact will depend very much on the current position of each individual organisation.

For those organisations whose most senior members currently play an active role in driving the OHSMS forward, the new requirements will likely involve a formalisation of current practice. However, for those organisations where top management have little involvement in the OHSMS, effectively devolving responsibility for their OHSMS to other levels within the organisation, the impact of the requirement of this clause will be significantly greater.

Where the word "ensuring" is applicable to an activity within the standard, top management may still assign this task to others for completion. Where the words "promoting", "taking", "engaging" or "supporting" appear, these activities cannot be delegated and must be undertaken by top management themselves.

Top management will need to be made aware of the new requirements including the fact that they will be audited as a matter of routine and on a wide set of issues. OH&S professionals can help to support top management in fulfilling their new responsibilities by suggesting strategy options, encouraging personal development and regularly reporting on all aspects of the OHSMS.

When ISO 45001 uses the term "top management", it is referring to a person or a group of people who directs and controls an organisation at the highest level.

» Implications for audit professionals

Auditors must ensure that they are well equipped to interview top management in respect of their leadership and commitment to their OHSMS.

To be effective and gain the respect of top management, auditors will need to have a good understanding of management roles, of the organisation they are auditing and of the business context surrounding it. They will have to be able to engage with top management on a range of subjects by conversing in an intelligent way. Auditors who fail to adequately prepare for top management interviews will risk damage to their reputation and that of the auditing profession.

For many auditors, this implies developing new and enhanced knowledge, skills and behaviours. There will not be much documented information as evidence of leadership and commitment. Gathering evidence from top management will mainly involve discussion and cross-checking of responses with other members of the organisation being audited. Audit trails across the OHSMS will reveal the extent to which leadership and commitment are exercised in the system.

5.2 OH&S policy

» **INTERPRETATION**

Top management must establish an OH&S policy that is consistent with the purpose and context of the organisation.

The policy represents a top management commitment on how to ensure the alignment of OH&S management to the long-term strategic intentions of the organisation. It must additionally provide a framework for setting and reviewing OH&S objectives.

Four specific commitments have to be included in the policy: to eliminate hazards and reduce OH&S risks, to comply with legal requirements and other requirements, to continually improve the OHSMS, and to promote consultation and participation of workers and, where they exist, workers' representatives.

The term "eliminate hazards" has to be considered in practical terms as an aspiration, probably not always achievable. "Reducing OH&S risks" is the more likely strategy for achieving safer working.

It is the responsibility of top management to review and maintain a documented OH&S policy, to communicate it within the organisation, to ensure that it has been understood and to make it available to interested parties.

> **"Top management must establish an OH&S policy that is consistent with the purpose and context of the organisation"**

» **Implications for OH&S professionals**

Since establishing a OH&S policy is a requirement incumbent on top management, OH&S professionals should not get directly involved in its compilation. They should not be tempted by top management to do the job for them (i.e. to draft a policy to be reviewed by top management and who may then sign it without due consideration of its contents). They can support top management by ensuring that they are aware of the policy requirements in the standard and by reviewing their draft policy for conformance.

Auditors should discuss the policy in detail directly with the top management. If they are redirected to a management representative, this probably has implications regarding top management commitment.

The requirement to determine that the OH&S policy is appropriate to the purpose and context of the organisation reinforces the need for auditors to establish their personal understanding of the context that the audited organisation is operating in.

However, from an auditor perspective it is important that top management can demonstrate, from their own understanding, that the policy is compatible with the strategic direction and context of the organisation and that it has been communicated and understood throughout the organisation.

Communication of the policy could be demonstrated by posters on the walls, but effective communication is two-way. Therefore, auditors should also ask workers about their understanding of the organisation's policy.

5.3 Organisational roles, responsibilities and authorities

» INTERPRETATION

The top management of the organisation need to ensure that defined responsibilities and authorities are assigned to individuals in the organisation to carry out OHSMS-related activities under their control.

Specifically, they need to assign responsibility and authority for:

- Ensuring that the requirements set out in ISO 45001 are met

- Reporting on the operation of the OHSMS

This may be achieved by appointing an OHSMS management representative or empowering a OH&S team to undertake these roles.

Top management need to ensure that such responsibilities and authorities relating to the organisation's OHSMS system are communicated and understood within the organisation and retained as documented information.

» Implications for OH&S professionals

While assigning roles within the OHSMS is the responsibility of top management, OH&S professionals can support them by providing strategy options, nominating roles for individuals or teams, suggesting personal development opportunities and assisting with communication throughout the organisation.

The role of management representative is not specifically identified in most ISO management system standards, and ISO 45001 is no exception. This ensures that ownership of the OHSMS does not centre on a single individual to the effective exclusion of top management. Duties assigned to the management representative in other ISO standards in the past, can now be assigned to any role or split across several roles.

The organisation may have to revisit the existing responsibilities and authorities with regards to the OHSMS, especially the responsibilities of top management and any management representative. The review may identify gaps in resources, including gaps in competence which will then need to be addressed before a compliant system can be established. In the particular case of OH&S, every person in the workplace needs to care not only about their own health and safety, but also the health and safety of other persons that may be under their supervision.

All workers should be given responsibility to report any hazardous situation without any fear of reprisal, so that any necessary action can be taken to prevent harm.

» **Implications for audit professionals**

Auditors must seek evidence that workers have not only been advised of their OH&S responsibilities and authorities, but that they also understand these in the context of what the OHSMS is trying to achieve.

Auditors should note that there is no requirement for top management to appoint a management representative, though the duties traditionally assigned to a management representative must still be undertaken.

5.4 Consultation and participation of workers

» **INTERPRETATION**

The consultation and participation of workers, especially non-managerial personnel, plays a key role in the development, performance evaluation and improvement of the OHSMS. The scope of the term "worker" includes all persons working under the control of the organisation (full-time or part-time employees at any level of the organisation, visitors, contractor's personnel or personnel carrying out an outsourced process).

This clause requires the organisation to provide mechanisms and resources, including the removal of any obstacles and barriers for consultation and participation of workers. These obstacles can include the penalisation of worker participation or ignoring workers' input and suggestions. Workers should be aware that they can stop working with no fear of reprisal if a hazardous situation arises.

Consultation and participation may be achieved through workers' representatives; these workers' representatives may represent the trade union of which workers are members, or may be appointed by other means.

Organisations must establish processes for consultation with all workers, particularly non-managerial personnel (or their representatives when appropriate) on relevant key aspects of the OHSMS. Consultation implies two-way communication, so workers (or their representatives when appropriate) can provide feedback to be considered by the organisation before taking a decision.

Organisations must establish processes for the participation of all workers, particularly non-managerial personnel (or their representatives) in the implementation of relevant key aspects of the OHSMS. Participation implies the contribution of workers (or their representatives) to decision-making related to OH&S performance and to proposed changes.

It is noted that the provision of training to workers at no cost and during normal working hours could remove barriers to their participation.

» Implications for OH&S professionals

While OH&S professionals may not be directly responsible for the requirements in this clause, they are likely to be involved in the setting up of consultation and participation processes. Top management, in conjunction with OH&S professionals and other management personnel, should develop the related processes and monitor their implementation.

When implementing the OHSMS, the difference between "participation" and "consultation" should be taken into account. Workers "participate" when they and their representatives are involved in decision-making, while workers and their representatives are "consulted" when the organisation seeks their views before taking a decision.

» Implications for audit professionals

Auditors should use sensitivity to fully assess conformance with the requirements of this section when interviewing not only those managers responsible for implementing the processes but also the workers' representatives and the workers themselves, as appropriate.

Auditors should note that this clause does not require documented information to be maintained or retained.

6 Planning

Planning in management systems is often viewed as something which relates mainly to setting up the system. While this is very important, the standard makes it clear that OHSMS planning is an ongoing activity which must continue throughout the life of the system in the never-ending PDCA cycle.

6.1 Actions to address risks and opportunities

» INTERPRETATION

General (6.1.1)

As part of risk-based thinking, organisations are required to consider their context (4.1), the relevant requirements of their relevant interested parties (4.2) and the scope defined for the OHSMS (4.3) when determining risks and opportunities. This means thinking about the internal and external issues they face, the relevant requirements of their interested parties within the defined scope of the OH&MS, and the impact this may have on systems and processes.

The scope of planning should be wide enough to provide assurance that the OHSMS can achieve its intended outcomes, to prevent or reduce undesired effects, and to achieve continual improvement. For every external and internal issue and for every relevant need and expectation of interested parties, a risk source may be identified.

This risk source associated with a potential or actual event or its consequence (defined as an occurrence or change of a particular set of circumstances) may constitute a threat or an opportunity for the organisation. When such an event occurs, the effect will be positive in the case of an opportunity, or negative in the case of a threat.

The determination of risks and opportunities should be carried out at both strategic and operational levels:

- those directly related to operational processes are defined as "OH&S risks" and "OH&S opportunities"

- those related to strategic levels are defined as "other risks to the OHSMS" and "other opportunities to the OHSMS"

Hazard identification and assessment of risks and opportunities (6.1.2)

The organisation is required to identify hazards (sources of potential to cause injury or ill health) associated with its operational processes throughout the organisation.

This is similar to the hazard identification procedures that OH&S professionals are likely to carry out in most organisations. These procedures must embrace all factors and all situations which could produce an actual or potential risk to health and safety.

When identifying these hazards, organisations should take into account the definition of "workplace". Note that it is not limited to the site where organisations perform their activities: "workplace" also covers any place, under the full or partial control of the organisation, where workers need to be present or go to for work purposes.

Once all hazards are identified, organisations need to conduct a risk assessment at two levels:

- assess OH&S risks from the identified hazards, taking into account the effectiveness of existing controls

- determine and assess the other risks to the system operations of the OHSMS

The methodology used for risk assessment and the criteria applied must be documented. Note that different methodologies can be used for different situations depending on the nature of the hazards and activities.

The organisation must retain documented information on the results of its determination and assessment of risks and opportunities.

In a similar way, the organisation needs to establish a process to determine and assess:

- opportunities to improve OH&S performance during the implementation of planned changes to the organisation, its policies, processes or activities. These opportunities may involve the adaptation of work, work organisation and work environment to workers, and the elimination of hazards and reduction of OH&S risks

- other opportunities for improving the system operations of the OHSMS

Determination of applicable legal requirements and other requirements (6.1.3)

The organisation must have a process to determine and have access to legal requirements and other requirements applicable to the OHSMS, and to determine how these requirements apply within the OHSMS.

The organisation is required to maintain and retain documented information on this process and its results.

Note that these requirements can result in both risks and opportunities to the OHSMS.

Planning action (6.1.4)

The organisation has to determine how to address those risks and opportunities that have been assessed as requiring further action.

This includes how to address legal requirements and other requirements and to prepare for and respond to emergencies.

When planning to take action, the organisation needs to apply, whenever possible, the "hierarchy of controls" common to risk management, i.e. eliminate, reduce, change, control, monitor etc.

The standard requires a planned and systematic approach with respect to these actions, with the actions being integrated into the OHSMS or other business processes when practicable. Subsequently the action must be evaluated to determine whether it was effective.

» Implications for OH&S professionals

This clause should allow OH&S professionals to demonstrate their expertise. They would be expected to have competence in identifying hazards, assessing OH&S risks and prescribing the required action accordingly.

An additional requirement is for organisations to determine those risks and opportunities that have the potential to affect the operation and performance of their OHSMS, both positively and negatively. This extends the work of the OH&S professional to interacting with top management, since most of these risks and opportunities will be related to corporate issues.

There is no specific requirement for a formal organisation-wide risk management or for a complicated risk management methodology (e.g. complicated tables or grading scales of formulae) since the level of complexity of the methodology depends on the nature of the hazards, risks and opportunities determined.

Actions taken to address risks and opportunities should be in proportion to the potential impact of the risk and opportunity on workers' OH&S or on the OHSMS. However not all risks and opportunities need actions. For example, organisations may take an informed decision to accept the risk, taking no action beyond identifying and evaluating it, including ongoing monitoring.

The actions planned may include establishing objectives (see 6.2 below) or incorporating the action into other OHSMS processes.

Subsequently, organisations need to evaluate the effectiveness of those actions.

» Implications for audit professionals

Auditors should seek evidence that confirms that an organisation has an appropriate methodology in place to effectively identify risks and opportunities in the planning of their OHSMS.

Auditors must clearly understand the difference between "operational" and "strategic" risks and opportunities and decide who, within the audited organisation, should be interviewed. It is likely that "operational" risks would be audited with operational supervisors and non-managerial workers, while "strategic risks" would be audited with members of the top management and OHSMS management.

The role of the auditor is not to carry out their own determination of risks and opportunities, but to ensure that the organisation is applying their methodology consistently and effectively. However, where the auditor's knowledge of the context of the organisation reveals that the organisation has failed to identify a commonly known risk or opportunity, they may question the organisation's approach.

Auditors should ensure that the organisation is taking a planned and structured approach to addressing risks and opportunities. For those actions that have been completed, auditors should ensure that each action's effectiveness has subsequently been assessed. They should also ensure that the action taken was proportionate to the risk or opportunity by determining the auditee's reasoning for it.

Auditors must ensure they have a good understanding of the concepts of risk and opportunity in the context of the OHSMS and of the range of methodologies that organisations may use to manage these areas.

6.2 OH&S objectives and planning to achieve them

» **INTERPRETATION**

OH&S objectives (6.2.1)

The definition of objective is "result to be achieved". Note that an objective can be expressed in different ways, e.g. as an intended outcome, a purpose, an operational criterion, as an OH&S objective, or in terms with similar meaning (e.g. aim, goal, or target).

The term "OH&S objective" narrows down the broader meaning of "objective" to "objective set by the organisation to achieve specific results consistent with the OH&S policy". An OH&S objective may be defined at various levels: strategic, cultural, project, product, service or process.

This clause applies only to "OH&S objectives" and requires organisations to set them for relevant functions, levels and processes within its OHSMS. It is up to the organisation itself to decide which functions, levels and processes are relevant. It would be expected that the organisation would prioritise objectives to deal with the hazards associated with the highest risk factors.

The organisation has to define OH&S objectives in order to maintain and continually improve its OHSMS and its OH&S performance. This means that organisations may set objectives on some processes to ensure that a certain level of performance is maintained, and on other processes to achieve a performance improvement.

When defining its OH&S objectives, the organisation must take into account the results of the assessment of risks and opportunities, the results of consultation with workers and their representatives and the applicable legal requirements and other requirements.

OH&S objectives must be measurable or capable of performance evaluation, communicated and updated as appropriate. They must also be monitored in order to determine whether they are being met.

Setting objectives is not a one-off activity. It should be an ongoing, recurring process that plays an important role in the continual improvement of the OHSMS.

Planning to achieve OH&S

Objectives (6.2.2)

Action plans to achieve operational OH&S objectives may be carried out by integrating them within the operational controls in the OHSMS.

Planning to achieve "improvement" OH&S objectives focused on improvement is likely to include determining the work required, the resources necessary to undertake this work, who will be responsible for ensuring that the work is done and when the work needs to be completed. Whenever possible, organisations should integrate the associated planned actions into their routine business processes.

Additionally, organisations must determine how to evaluate whether the expected results have been achieved and should use indicators whenever practicable.

The organisation has to maintain and retain documents providing information on the OH&S objectives and plans to achieve them.

"Setting objectives is not a one-off activity"

» **Implications for OH&S professionals**

OH&S professionals need to be aware that, as mentioned above, the use of "objectives" is not limited to improvement processes. An objective may be set in order to maintain a certain level of performance.

Organisations may need to define objectives at different levels. When doing so, they need to ensure the alignment of those objectives to their strategic direction.

> **Note** that the concept of a "target" used in other management system standards is contained within the term "OH&S objective". There is no material difference between objectives and targets in ISO 45001.

The organisation has to define indicators to monitor the achievement of objectives. Indicators are a measurable representation of the status of operations, management or conditions. Each objective will need one or more associated indicators for monitoring purposes.

Objective planning includes what needs to be done, but also what resources will be required to do it, who will do it, when it will be completed and how it will be evaluated in order to determine if results have realised the objective.

OH&S professionals will need to interact with most, if not all, functions of the organisation in order to facilitate the setting of objectives.

» **Implications for audit professionals**

Auditors will need the competence to audit a set of interrelated objectives, ensuring that they are mutually consistent and aligned with the strategic direction of the organisation, particularly those relating to improvement of the OHSMS.

Auditors should look for evidence that effective planning is taking place to support the achievement of the organisation's OH&S objectives, including the use of indicators, which need to be audited in detail.

7 Support

Clause 7 is part of the "Do" step of the PDCA cycle, where necessary resources are considered in order to be able to do what it was planned in clause 6.

7.1 Resources

» **INTERPRETATION**

The organisation must initially determine and provide the resources necessary to establish, implement, maintain and continually improve its OHSMS. Release of resources is a function of management at the top level of the organisation. The provision of resources can be a limitation on the effectiveness of the OHSMS.

Examples of resources include people, raw materials, infrastructure (including buildings, equipment and utilities), finance, IT and software, communications and emergency containment, all of which can be either internally or externally provided.

» **Implications for OH&S professionals**

OH&S professionals should ensure that the different types of resources needed for the OHSMS are identified. Resources can be tangible or intangible, such as intellectual property.

» **Implications for audit professionals**

Auditors should check that the organisation has identified all types of resources required by the OHSMS, and that those resources will be available when needed. There are likely to be budgetary considerations relating to the management of resources.

7.2 Competence

This clause is designed to ensure that workers are knowledgeable of the hazards and risks associated with their working environment and possess the competence to stay safe.

The organisation must determine the competence requirements for those workers that affect, or could affect, OH&S performance.

Once these competence requirements have been determined, the organisation must then ensure that those workers possess the necessary competence, on the basis of the appropriate combination of education, training or experience. The standard singles out the identification of hazards as a particular competence requirement.

If those people are found not to be competent, the organisation is required to take action (e.g. remedial training, recruitment or the use of external people) in order to acquire the necessary competence. The actions taken need to be evaluated for effectiveness in raising competence to the required level.

Organisations should be aware that the term "workers" means all persons performing work under its control under various arrangements: paid or unpaid, full-time or part-time, temporarily, intermittently or seasonally, managerial and non-managerial. Workers can be employed by the organisation, by external providers, contractors, agency workers or any other person to the extent the organisation shares control over their work.

Organisations need to maintain and retain documented information as evidence of competence.

» Implications for OH&S professionals

Competence is defined as the "ability to apply knowledge and skills to achieve intended results". Training is one of the ways organisations can achieve the necessary competence. OH&S professionals can contribute their knowledge to the training of others.

Workers can assist the organisation in determining the competence necessary for each role.

Workers should also have the necessary competence to remove themselves from situations of imminent or serious danger. To do so, they need to be competent in identifying hazards and associated risk. Workers' representatives need to be competent to carry out their functions effectively.

In many countries, the law requires that OH&S training be provided to workers at no cost and during normal working time.

Auditors should verify whether organisations have determined the necessary competence with regard to OH&S for each role, and assess how they can ensure that competence requirements have been met.

Simply recording staff training may not be sufficient to demonstrate competence as defined in the standard. The effectiveness of the training must be demonstrated.

Another key issue auditors need to verify is whether or not competence is kept up-to-date. If this is not done, knowledge, skills, and behaviours can become outdated due to changes in the organisation, technology and processes.

7.3 Awareness

» INTERPRETATION

Awareness is knowledge-based and there are explicit requirements for people performing work under the organisation's control to be aware of its OH&S policy, any OH&S objectives that are relevant to them, how they are contributing to the effectiveness of the OHSMS and the implications of not conforming to OH&S requirements.

Workers have to be informed of the incidents, related investigations, hazards and OH&S risks relevant to them, and must be able to stop working without fear of reprisal if they consider that it presents an imminent danger to their life or health.

» Implications for OH&S professionals

OH&S professionals can assist the organisation in planning systematic activities to ensure a good level of awareness of OH&S among all workers, managerial and non-managerial, and among interested parties such as visitors.

The conduct of regular training activities by OH&S professionals can help to ensure that worker awareness of OH&S issues is maintained at an acceptable level.

» Implications for audit professionals

Auditors will have to conduct interviews with workers at all levels to verify whether OH&S awareness is at an acceptable level. Note that the standard does not require records of awareness training to be kept, although in some countries this is a legal requirement.

7.4 Communication

This requirement encompasses all internal and external communication relating to an OHSMS. Organisations need to develop and implement a process to determine those matters relating to the management system on which it wishes to communicate, the timing of such communications, their target audience and the method of delivery.

Organisations need to take into account the legal requirements and other requirements, and diversity considerations (e.g. gender, culture, literacy, disability) which may affect communication needs.

The process has to ensure that

- the communication is reliable and consistent with the information generated by the OHSMS,

- all communications received are responded to, and

- documented information is retained as evidence of communications, as appropriate

Both internal and external communication flows must ensure that the information required by all parties in the OHSMS is available when required, to ensure the effective working and continual improvement of the system.

» Implications for OH&S professionals

OH&S professionals have a key role to play in the quality of communication, by making sure that it is reliable, consistent, transparent, appropriate, complete, factual, accurate, able to be trusted, understandable to interested parties, truthful and not misleading.

» Implications for audit professionals

Auditors should ensure that the organisation has identified external and internal communications that need to take place in respect of the operation of its OHSMS and that appropriate documented evidence is retained of these communications. Although documentary evidence should be available, auditors should also conduct interviews with key personnel to determine the effectiveness of communications in the OHSMS.

Auditors should be aware that key factors of an effective communication process are:
- the quality of the information

- the manner in which information is used

7.5 Documented information

» **INTERPRETATION**

Mandatory documents include the documented information required in ISO 45001 and additional information identified by organisations as necessary for the effective operation of their OHSMS. Note that there is no requirement for "documented procedures" in the standard, but "documented information" includes documentation of processes as well as records in the OHSMS.

The extent of documented information can differ among organisations due to their size, complexity and the competence of workers.

The document control requirements common to other management systems are required, i.e. when documented information is created or updated, the organisation must ensure that it is appropriately identified and described (for example by the title, date, author or reference number). The format of information (e.g. the language, software version, graphics) should be appropriate, and it should be delivered on appropriate medium (e.g. paper, electronic).

Documented information must be reviewed and approved for suitability and adequacy.

Organisations are required to control documented information in order to ensure that it is available where needed and is suitable for use. It must also be adequately protected against improper use, loss of integrity and loss of confidentiality.

Organisations must determine how they will:

• distribute, access, retrieve and use documented information

• store and preserve documented information

• control any changes to the documented information

• retain and dispose of documented information

Organisations are also required to identify any documented information of external origin that they consider necessary for the planning and operation of their OH&S management systems. Such documentation must be identified and controlled.

> **Note** that there is no requirement for documented information to be maintained or retained for the document control processes themselves, unless the organisation deems it necessary.

» Implications for OH&S professionals

OH&S professionals can assist top management in determining which documented information would be beneficial in the OHSMS, in addition to the mandatory documentation specified throughout the standard. This may be used for different purposes, e.g. accountability, consistency, training or transparency.

Where organisations choose to hold their documented information in electronic forms, there may be a need to establish access controls (i.e. user logins and passwords) and authorisation levels in order to ensure controls are appropriate.

Organisations will need to consider how such systems are to be protected when IT systems break down, and how access to the documented information can be preserved in the event of IT systems being unavailable. They will also be required to demonstrate how the integrity of their documented information is maintained. This involves issues of cybersecurity, backup systems, technology settings etc.

» Implications for audit professionals

Auditors will have to audit without relying on documented procedures when gathering evidence. They will need to use interview and observation skills more often to obtain evidence.

Auditors will increasingly access and use electronic systems in order to evidence how organisations control their documented information. This could require additional competences in the technologies employed.

8 Operation

This section focuses on management and control of the operational processes of the OHSMS conducted by the organisation for the purpose of establishing and maintaining a safe workplace.

8.1 Operational planning and control

» INTERPRETATION:

General (8.1.1)

Organisations need to plan, implement and control its operational processes by establishing operating criteria and implementing control of the processes in accordance with these operating criteria.

Organisations need to maintain and retain documented information to the extent necessary to have confidence that the processes will be carried out as planned. In other words, the organisations decide which documented information will be under the OH&MS control on the operational processes.

On sites where multiple employers are operating, organisations will have to co-ordinate their OH&S management systems with one another.

Eliminating hazards and reducing OH&S risks (8.1.2)

Organisations must apply the principle of "hierarchy of control" when managing hazards and their associated risks. This involves prioritising control actions in a sequential approach as follows:

- first option: eliminate hazard

- second option: substitute with less hazardous processes, materials or equipment

- third option: use reengineering and reorganisation of work

- fourth option: use administrative controls, including training

- fifth option: use personal protection equipment.

In many countries the provision of personal protection equipment at no cost to workers is a legal requirement. While this is not a requirement of the standard, it is a practice that could enhance OH&S performance.

Management of change (8.1.3)

Organisations have to establish processes which assure that the integrity of the OHSMS is maintained during periods of change in the organisation. Where necessary, the organisation should take action to address or mitigate any adverse effects of changes.

Changes can occur when, for example:
- new products, services and processes are introduced

- new working conditions, equipment and work conditions are implemented

- new legal and other requirements become applicable

- new information of hazards and OH&S become available

- new technology and knowledge is introduced

Procurement (8.1.4)

This section covers various issues which can affect an OHSMS: purchasing products, purchasing services (contracting) and outsourcing processes.

a) Purchasing of products (e.g. materials, tools, equipment, furniture, instruments)

Organisations must ensure that purchased products meet the requirements of the OHSMS. This may involve the specification of OH&S requirements in contracts, risk assessment before use, verification of safety requirements, evaluation of compliance with legal requirements, and consultation and communication with workers.

b) Purchasing of services (contracting / outsourcing)

Organisations cannot "contract out" their responsibilities in the OHSMS. When contracting with an external organisation for services, they need to ensure that hazards and associated risks when working with contractors are identified and controlled by both parties wherever the work takes place. Organisations need to define OH&S criteria for the selection of contractors.

It may be helpful to include OH&S criteria for the selection of contractors in contractual documents.

Outsourcing (or subcontracting) in ISO 45001 is the employment of an external organisation to perform one or more processes in the OHSMS. This includes system processes as well as operational processes.

In this case, the responsibility for conforming to the requirements of the standard is retained by the organisation, because the outsourced process remains as part of the organisation's OHSMS, including the necessary controls exerted on the outsourced process for OH&S purposes.

Factors determining the extent of the control on outsourced processes include:

- the ability of the external organisation to meet the organisation's OHSMS requirements

- the technical competence of the organisation to determine hazards, assess risks and determine appropriate controls

- the potential effect the outsourced processes may have on the organisation's ability to achieve the intended outcomes of its OHSMS.

» Implications for OH&S professionals

OH&S professionals can help the organisation to clearly define the degree of control on contractors and outsourced processes.

OH&S professionals can work with each contractor to identify specific hazards and risks, and establish the degree of control to be exercised over them.

Any OH&S documented information required from the outsourced organisation should be treated and controlled as part of the organisation's OHSMS documented information.

The subcontractor providing the outsourced process does not necessarily need to implement an OHSMS, but has to comply with the organisation's requirements while doing work for it.

» Implications for audit professionals

Since activities and processes conducted by contractors and subcontractors are covered by the organisation's OHSMS, they are subject to internal audit and, possibly, external audit.

Auditors may use risk-based criteria to decide which ones need to be audited more frequently, especially those contractors or outsourced processes that deal with high-risk hazards.

8.2 Emergency preparedness and response

» **INTERPRETATION**

The standard requires the organisation to establish, implement and maintain processes to prepare for emergency situations and to respond if they occur, including the provision of first aid.

The emergency situations to be covered may originate within or outside the organisation and have the potential to affect the health and safety of workers.

Organisations have to ensure that emergency plans are ready to be triggered and that they have the capability to respond effectively to emergency situations. In order to do so, the planned response actions need to be tested, reviewed and revised if necessary, in particular after the occurrence of emergency situations and after tests.

Interested parties need to be made aware of these arrangements (and when necessary trained, if they are required to participate in the emergency response) or if they may be affected by the emergency situation. Workers, in particular, should be informed of their duties and responsibilities in emergency situations.

Organisations need to maintain and retain documented information on their emergency response processes and plans. This may include response procedures, data to be communicated, test results, training records and improvement action plans.

» **Implications for OH&S professionals**

OH&S professionals can deploy their expertise not only developing processes and plans, but also communicating them to all parties potentially involved in emergencies, and testing them in drills. They can take a lead in emergency responses, keeping people informed providing any necessary training, generating the required documented information and finally, keeping all parties involved updated and alert.

The emergency preparedness and response processes may include the training of emergency teams, a list of key personnel and aid organisations, contact details of key interested parties, evacuation routes and assembly points and the possibility of assistance from neighbouring organisations.

» **Implications for audit professionals**

Unless emergency response tests are being conducted at the time of audit, auditors will have to rely on interviews and documentation to verify conformance with this requirement. Audit trails could easily follow the PDCA cycle as applied to emergency response processes.

Note that every discrepancy found during the audit of the emergency plans or any incident which occurred during an emergency or drill has to be considered as a nonconformity in the system, and appropriate corrective actions have to be taken in order to prevent its recurrence.

9 Performance evaluation

This is a key section of the standard where processes are established and implemented to check if the system and operational processes implemented in the OHSMS are producing the expected results.

9.1 Monitoring, measurement, analysis and evaluation

» **INTERPRETATION**

First, organisations must determine what they need to monitor and measure in order to determine the performance of the OHSMS and evaluate its effectiveness (e.g. its progress on OH&S objectives, characteristics of activities and operations related to the identified hazards, risks and opportunities, the compliance level of legal requirements and other requirements). This includes the determination of the criteria against which OH&S performance will be evaluated, including appropriate indicators.

As part of the process, organisations have to determine the methods for accurate monitoring and measurement using calibrated equipment where appropriate. This ensures that analysis and performance evaluation is based on results that are valid. These methods may include, as appropriate, statistical techniques to be applied to the analysis of those results.

In addition, organisations must also determine when monitoring and measurement should be carried out, including when the results of monitoring and measurement should be analysed and evaluated.

Organisations have to retain appropriate documented information as evidence of the results of monitoring, measurement, analysis and evaluation and of the maintenance, calibration or verification of measuring instruments.

» **Implications for OH&S professionals**

OH&S professionals can use their experience to ensure that the extent of planning, monitoring and measuring is consistent with the nature of the organisation's processes and is compatible with the associated analysis and evaluation.

OH&S professionals can ensure that the results of monitoring and measurement are reliable, reproducible and traceable, in order to generate a consistent set of data that can be analysed, using statistical techniques when appropriate.

OH&S professionals can apply their knowledge to the evaluation of fulfilment of legal requirements and other requirements. They can assist organisations in setting up a process that will involve the determination of the frequency of the evaluation, the execution of the evaluation and the actions that need to be taken. If required, OH&S professionals should be able to undertake a full legal compliance audit with full documented reporting.

If during a compliance audit by any party, a failure to fulfil a legal requirement or other requirements is identified, the organisation needs to take action to achieve compliance. This may require getting in contact with a regulatory agency to agree the action to be taken. Once that agreement is in place, it becomes a legal requirement that has to be fulfilled, usually confirmed in documentation by the regulator.

» Implications for audit professionals

Auditors need to obtain evidence of analysis and evaluation of data obtained from monitoring and measurement relating to OH&S.

Auditors should have a basic knowledge of the safe working of processes and of the statistical techniques used by the organisation in order to evaluate the effectiveness of the processes related to this aspect.

OHSMS audit professionals, or internal auditors, are not expected to conduct legal compliance audits but rather to evaluate whether the OHSMS processes are effective in ensuring such compliance by the organisation.

Auditors of legal compliance require a different skillset than that of systems auditors. It should be noted that legal compliance audits are not required by the standard.

9.2 Internal audit

» INTERPRETATION

This requirement is very similar to the internal audit requirements of most other management system standards, being based on ISO 19011.

The standard contains the requirement for organisations to carry out internal audits at planned intervals in order to provide information as to whether the OHSMS conforms to both the organisation's own requirements and the requirements of the standard.

Internal audits must also provide information that could be used to determine whether the OHSMS is being effectively implemented and maintained.

This clause also sets out a series of requirements relating to how audit programmes must be structured, what audits must cover, who should undertake audits and how audits are to be reported.

The audit programme needs to reflect the importance of the processes concerned, changes in the organisation, risks and opportunities, and the results of previous audits.

Each audit needs to have a defined scope and its own audit criteria. Audits and auditors need to be impartial and objective. This means that internal auditors cannot audit processes in which they are or have been involved, either in planning or operationally at a managerial or non-managerial level.

The findings from audits need to be fed back to the relevant management and any required corrections or corrective actions must be taken in a timely manner.

The relevant audit results must also be reported to workers or workers' representatives and other relevant interested parties.

Documented information needs to be retained to provide evidence that the audit programme has been implemented. Documented information must also exist to provide evidence of the results of audits.

» Implications for OH&S professionals

OH&S professionals would normally be expected to have the competence to conduct internal audits of the OHSMS.

The purpose of internal audits is to provide information on whether the OHSMS conforms to the requirements of the standard and any additional requirements determined by the organisation. OH&S professionals should be able to determine this from the conduct of the audit programme.

The results of internal audits need to be fed back to "relevant management", i.e. to those individuals best placed to act on the audit findings. Workers and other interested parties also need to be informed of the relevant results.

Note that there is no requirement for organisations to establish a documented internal audit procedure. However, organisations may still choose to operate one if they wish.

OH&S professionals should note the need to retain documented information evidencing the implementation of an audit programme and the results of audits.

» Implications for audit professionals

The internal audit processes must also be audited. Audit professionals should access documented information confirming the implementation of an audit programme by the organisation. Documented information must also be available to evidence the results of audits. Audit professionals can learn a great deal about the effectiveness of the OHSMS itself by conducting a thorough audit of its internal audit processes.

9.3 Management review

This clause requires reviews of the suitability, adequacy and effectiveness of the OHSMS to be undertaken by top management at planned intervals. In other words, top management have to determine, from time to time, the extent to which the OHSMS is producing its intended outcomes.

The items that top management must, as a minimum, consider during a management review are actions from previous reviews, changes in the external and internal context, updates in the legal requirements and other requirements, adjustments to risks and opportunities, and alterations to relevant communications with interested parties.

The reviews should also include information on OH&S performance, including trends in:

- the achievement of objectives

- incidents, nonconformities and corrective actions

- results from internal and external audits

- results from evaluation of fulfilment of legal requirements and other requirements

- results from consultation and participation of workers

Trend analysis is an important function for top management to address because it can reveal whether the outcomes of the OHSMS produce a safer workplace for all parties on an ongoing basis. If it is failing in this regard, there are serious implications for the organisation in a number of areas.

The management review process should not just look at historical trends but give top management the opportunity to influence the future performance of the OHSMS by taking decisions to initiate improvements. They need to address identified weaknesses in the system by making changes, directing strategies for improvement and setting new high-level OH&S objectives.

Such decisions need to be documented and communicated across the organisation.

» Implications for OH&S professionals

OH&S professionals can contribute to the management review by preparing data on the performance of the OHSMS during the relevant period since the previous review. They can supplement this work by making recommendations on future actions.

The management review should be high-level, based on the review of key factors which affect the suitability, adequacy and effectiveness of the OHSMS. The management review topics need not be addressed all at

once. Although not a common methodology, the review may take place incrementally over a period of time and can be part of regularly scheduled management activities, such as board or operational meetings. It does not need to be a separate activity.

Some organisations may ask the OH&S professional to prepare all of the information needed for this review along with a draft of the conclusions. For such a contribution to have the maximum effectiveness, the information should originate from each relevant manager, the analysis should be closely reviewed and the associated decisions taken by top management. This is another example of the extensive involvement by top management that the standard expects.

» Implications for audit professionals

Auditors should expect to assess a strategically focused management review of the OHSMS. Context, risks and opportunities need to be considered, as well as the alignment of the OH&S to the organisation's overall strategic objectives.

Auditors should not audit this requirement only by conducting an interview with the OH&S professional, who typically has all necessary records to show, but is not the owner of the management review process.

Auditors should definitely audit this clause with top management. In order to do so effectively, they must gather evidence, face-to-face with one or more senior managers, on corporate strategy issues relating to the OHSMS that go beyond operational issues. They must be competent to be able to audit at a corporate level.

"Auditors should expect to assess a strategically focused management review of the OHSMS"

10 Improvement

The principle of focusing on improvement is intrinsic to the OHSMS in all areas. There is no such thing as a perfect system, but organisations must strive towards achieving the best possible performance of the OHSMS at all times. This section specifies the requirements which can help organisations towards this goal.

10.1 General

» **INTERPRETATION**

Organisations must actively seek out and realise improvement opportunities that will better enable them to achieve the intended outcomes of the OHSMS.

The OHSMS will generate many potential sources of improvement opportunities including the results of analysis and evaluation of OH&S performance, evaluation of compliance, internal audits and management reviews.

Improvement can also originate from corrective action, continual improvement, through breakthrough change, innovation and reorganisation.

» **Implications for OH&S professionals**

OH&S professionals can help organisations ensure that they have processes in place to review the results of all evaluations carried out within the OHSMS, to identify opportunities for improvement and to take improvement actions.

OH&S professionals should encourage top management to adopt ambitious improvement goals by setting bold objectives, leading improvement initiatives, providing necessary resources and striving to become a benchmark for OHSMS performance in their business sector.

» **Implications for audit professionals**

Auditors should seek objective evidence that actions relating to improvement are taking place within the OHSMS. This can come from metrics used in evaluation and analysis, comparing results from the internal audit programme, results of preventive actions and actions to achieve objectives. Note that it is not a non-conformance if an organisation fails to achieve set objectives, as long as the system determines the reasons for any shortfall and takes the opportunity to improve.

Auditors need to be competent in the use of various types of metrics, know how to interpret them, and be familiar with the technology in use by the organisation.

10.2 Incident, nonconformity and corrective action

» **INTERPRETATION**

This clause sets out how organisations are required to act when an OH&S incident or system nonconformity is identified. In such instances, the organisation is required to take whatever action is necessary to control and correct the nonconformity, and to deal with the consequence. A key requirement is to identify the root cause of the incident or non-conformance and take appropriate action to prevent recurrence.

While root cause analysis is being performed, organisations may also have to undertake immediate but temporary actions to prevent the occurrence of the same nonconformity or incidents. This would be part of "corrective" action.

Corrective actions identified as necessary to eliminate the cause of the non-conformance should align with the hierarchy of controls. Note that the OH&S risks related to new or changed hazards have to be assessed before taking action in accordance with the processes of the OHSMS.

Organisations must also review the effectiveness of corrective actions and, if necessary, make further changes to the OHSMS itself.

Documented information has to be retained as evidence of the nature of the incidents or nonconformities that have occurred and of any corrective action taken, including their effectiveness.

» **Implications for OH&S professionals**

OH&S professionals can use their expertise to determine the root cause of incidents and nonconformities including whether other similar nonconformities exist (or potentially could exist) elsewhere. They are also best placed to suggest at which level the most effective corrective action lies in the hierarchy of controls.

Documented information must be retained not only on the results of the actions taken, but also the nature of the nonconformities, as well as any subsequent actions taken.

» **Implications for audit professionals**

Auditors should gather evidence of the processes in the OHSMS that deal with the initial handling of an incident or nonconformity, including the triggering of emergency response if necessary, the evaluation of the root cause, the implementation of correction and corrective action and the subsequent review of its effectiveness. Audit trails could be based on the PDCA cycle associated with this aspect of the OHSMS.

> **Note** that an "incident" is an occurrence out of, or in the course of, work that could or does result in ill and ill health. Some organisations may use the term "incident" (or "near miss") in cases where injury of ill health could have occurred but did not, and the term "accident" when an injury or ill health did occur.

Ensure that the required documented information is available covering the entire scope of the incident or nonconformity.

10.3 Continual improvement

» **INTERPRETATION**

The principle of continual improvement is embodied in most other management systems. It is designed to inculcate an organisational culture and mentality of striving to achieve a better performance out of the OHSMS overall by seeking opportunities to improve.

Actions which an organisation might take with a view to achieving continual improvement include:

- enhancing OH&S performance

- promoting a proactive culture that provides support to the OHSMS

- promoting the participation of workers in the identification and implementation of opportunities for improvement

- communicating to workers the results of the improvement actions taken

» **Implications for OH&S professionals**

The OH&S professional can facilitate and lead this process of engendering a focus on improvement. Nevertheless the participation of top management and the involvement of workers in the review and decision-taking are key factors for a successful improvement process.

"The participation of top management and the involvement of workers in the review and decision-taking are key factors for a successful improvement process"

» Implications for audit professionals

Auditors should be able to track the organisation's improvement processes throughout the whole OHSMS.

Auditors should evidence that organisations are using the outputs from their analysis and evaluation, internal audit and management review processes to identify improvement opportunities and OH&S underperformance. They should also verify that the organisation is using suitable tools and methodologies to support its investigations.

They should also check whether the organisation has implemented the identified opportunities for improvement in a planned and controlled manner and whether the whole workforce, from top management to non-managerial workers, participated in the process.

Annex A (informative) Guidance on the use of this International Standard

This annex provides explanatory guidance on the requirements of the standard with the intention of preventing misinterpretations of the standard's requirements. OH&S professionals will find clarification of most requirements whether for implementation or auditing purposes. Auditors should bear in mind that the annex is purely informative, and should not be used as the basis for audit criteria.

Bibliography

The bibliography contains references to the management system and other standards and guidance documents which have contributed to the compilation of ISO 45001.

Alphabetical Index of Terms

This annex provides a list of the 37 terms found in clause 3, grouped by families of related terms. The list is in alphabetic order, and will be a very useful reference to easily find the specific terms used in ISO 45001.

Conclusion

Since the launch of the ISO 9000 quality management system standard series in 1987 and its cousin, the ISO 14001 environment management system standard, in 1996, around 1.5 million organisations in some 175 countries are known to have implemented these two standards. It has taken some considerable time, but now a new standard is about to join the family: the occupational health and safety management system standard ISO 45001. Its origins lie in the standard OHSAS 18001, which was published in 1999 by a group of parties interested in a unified approach to an OH&S management system standard. Since then, it is believed that around 160,000 organisations have implemented this standard. Its successor, ISO 45001, is formally recognised by the international standards community, and as such is poised to play an even more important role alongside its two close friends.

The new standard adopts in full the text of Annex SL, with very minor modifications. Therefore, it aligns with ISO 9001 and ISO 14001: with the same structure, same terms and definitions, and same generic text.

Organisations will now have a model that integrates OH&S into the strategy and decision-making processes at all levels, and contributes to their sustainability. Top management will be much more involved in OH&S matters and will be challenged to demonstrate their leadership and commitment. Workers will benefit from enhanced care of their OH&S needs but will also be challenged to participate in many instances of the OHSMS development, planning and operation.

OH&S professionals will find little change in all technical and operational OH&S-related issues, but will have to be able to interact with top management and to assist top management to discharge their duties and responsibilities.

Internal and external OHSMS auditors will need the competence to audit top management more rigorously, possess knowledge of corporate working and be more aware of business strategies.

The publication of ISO 45001 in March 2018 will signal the start of a three-year migration period during which those organisations which are OHSAS 18001-certified and wish to migrate to the new standard will need to make changes to their existing OH&S management systems.

The CQI recognise that the new standard may need considerable support for its introduction. That is why we have committed to supporting our members and certificated auditors, not just through the development stages, but beyond the publication of the new standard.

Whatever your role is in the OH&S profession and whatever sector your organisation may operate in, the CQI will be on hand to provide informed and impartial advice to help you make the migration successfully.

The Chartered Quality Institute (CQI)

The CQI is the chartered body for quality management professionals.

It exists to benefit the public by advancing education in, knowledge of and the practice of quality in industry, commerce, the public sector and the voluntary sectors. **www.quality.org**

The International Register of certificated Auditors (IRCA)

IRCA is a division of the CQI and is the leading professional body of management system auditors **www.quality.org**