

DRAFT SAINT LUCIA NATIONAL STANDARD

DNS/ISO 45001: 2018

**OCCUPATIONAL HEALTH AND SAFETY MANAGEMENT SYSTEMS
— REQUIREMENTS WITH GUIDANCE FOR USE (ISO 45001: 2018,
IDT)**

Stage 40 — ENQUIRY DRAFT

JUNE 2018

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THIS IS AN IDENTICAL ADOPTION OF ISO 45001: 2018

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**OCCUPATIONAL HEALTH AND SAFETY MANAGEMENT SYSTEMS
— REQUIREMENTS WITH GUIDANCE FOR USE*****AMENDMENTS ISSUED SINCE LAST PUBLICATION***

Amendment No.	Date of Issue	Type of Amendment	Text(s) Affected

ENQUIRY STAGE - JUNE 2018

ENQUIRY STAGE - JUNE 2018

DRAFT SAINT LUCIA NATIONAL STANDARD

DNS/ISO 45001: 2018

**OCCUPATIONAL HEALTH AND SAFETY MANAGEMENT SYSTEMS
— REQUIREMENTS WITH GUIDANCE FOR USE**

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DNS/ISO 45001: 2018

**OCCUPATIONAL HEALTH AND SAFETY MANAGEMENT SYSTEMS
— REQUIREMENTS WITH GUIDANCE FOR USE**

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Contents	Page
Foreword.....	0
1 Scope	4
2 Normative references.....	5
3 Terms and definitions	5
4 Context of the organization	
5 Leadership and worker participation	
6 Planning	
7 Support.....	
8 Operation	
9 Performance evaluation	
10 Improvement.....	
Annex A (informative) Guidance on the use of this document.....	13
Bibliography	33

ENQUIRY STAGE - JUNE 2018

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ENQUIRY STAGE - JUNE 2018

National foreword

0.1 Background

An organization is responsible for the occupational health and safety of workers and others who can be affected by its activities. This responsibility includes promoting and protecting their physical and mental health.

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

0.2 Aim of an OH&S management system

The purpose of an OH&S management system is to provide a framework for managing OH&S risks and opportunities. The aim and intended outcomes of the OH&S management system are to prevent work-related injury and ill health to workers and to provide safe and healthy workplaces; consequently, it is critically important for the organization to eliminate hazards and minimize OH&S risks by taking effective preventive and protective measures.

When these measures are applied by the organization through its OH&S management system, they improve its OH&S performance. An OH&S management system can be more effective and efficient when taking early action to address opportunities for improvement of OH&S performance.

Implementing an OH&S management system conforming to this document enables an organization to manage its OH&S risks and improve its OH&S performance. An OH&S management system can assist an organization to fulfil its legal requirements and other requirements.

0.3 Success factors

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

The implementation and maintenance of an OH&S management system, its effectiveness and its ability to achieve its intended outcomes are dependent on a number of key factors, which can include:

- a) top management leadership, commitment, responsibilities and accountability;
- b) top management developing, leading and promoting a culture in the organization that supports the intended outcomes of the OH&S management system;
- c) communication;
- d) consultation and participation of workers, and, where they exist, workers' representatives;

- e) allocation of the necessary resources to maintain it;
- f) OH&S policies, which are compatible with the overall strategic objectives and direction of the organization;
- g) effective process(es) for identifying hazards, controlling OH&S risks and taking advantage of OH&S opportunities;
- h) continual performance evaluation and monitoring of the OH&S management system to improve OH&S performance;
- i) integration of the OH&S management system into the organization's business processes;
- j) OH&S objectives that align with the OH&S policy and take into account the organization's hazards, OH&S risks and OH&S opportunities;
- k) compliance with its legal requirements and other requirements.

Demonstration of successful implementation of this document can be used by an organization to give assurance to workers and other interested parties that an effective OH&S management system is in place. Adoption of this document, however, will not in itself guarantee prevention of work-related injury and ill health to workers, provision of safe and healthy workplaces and improved OH&S performance.

The level of detail, the complexity, the extent of documented information and the resources needed to ensure the success of an organization's OH&S management system will depend on a number of factors, such as:

- the organization's context (e.g. number of workers, size, geography, culture, legal requirements and other requirements);
- the scope of the organization's OH&S management system;
- the nature of the organization's activities and the related OH&S risks.

0.4 Plan-Do-Check-Act cycle

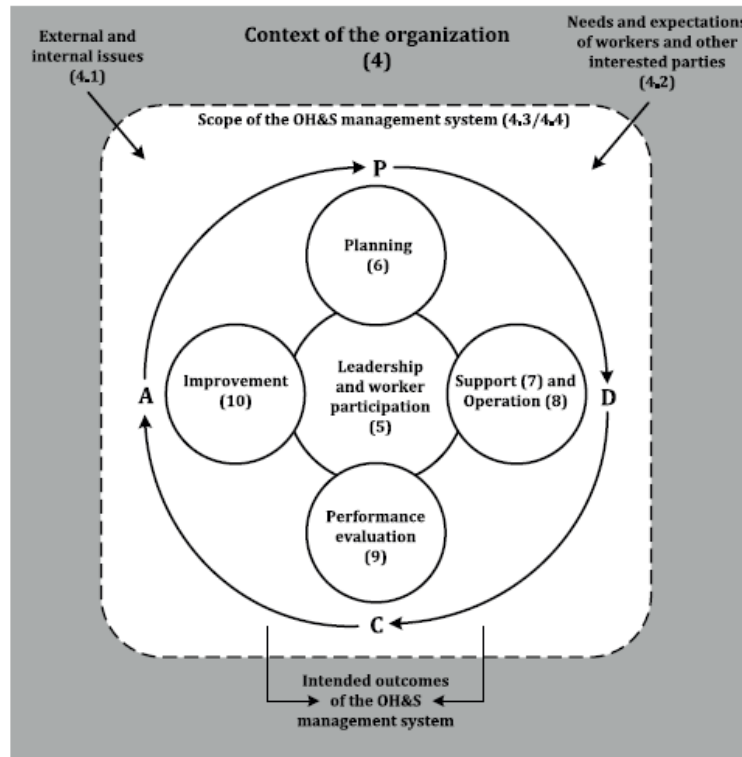
The OH&S management system approach applied in this document is founded on the concept of Plan-Do-Check-Act (PDCA).

The PDCA concept is an iterative process used by organizations to achieve continual improvement. It can be applied to a management system and to each of its individual elements, as follows:

- a) Plan: determine and assess OH&S risks, OH&S opportunities and other risks and other opportunities, establish OH&S objectives and processes necessary to deliver results in accordance with the organization's OH&S policy;

- b) Do: implement the processes as planned;
- c) Check: monitor and measure activities and processes with regard to the OH&S policy and OH&S objectives, and report the results;
- d) Act: take actions to continually improve the OH&S performance to achieve the intended outcomes.

This document incorporates the PDCA concept into a new framework, as shown in Figure 1.



NOTE The numbers given in brackets refer to the clause numbers in this document

Figure 1 — Relationship between PDCA and the framework in this document

0.5 Contents of this document

This document conforms to ISO's requirements for management system standards. These requirements include a high level structure, identical core text and common terms with core definitions, designed to benefit users implementing multiple ISO management system standards.

This document does not include requirements specific to other subjects, such as those for quality, social responsibility, environmental, security or financial management, though its elements can be aligned or integrated with those of other management systems.

This document contains requirements that can be used by an organization to implement an OH&S management system and to assess conformity. An organization that wishes to demonstrate conformity to this document can do so by:

- making a self-determination and self-declaration, or
- seeking confirmation of its conformity by parties having an interest in the organization, such as customers, or
- seeking confirmation of its self-declaration by a party external to the organization, or
- seeking certification/registration of its OH&S management system by an external organization.

Clauses 1 to 3 in this document set out the scope, normative references and terms and definitions which apply to the use of this document, while Clauses 4 to 10 contain the requirements to be used to assess conformity to this document. Annex A provides informative explanations to these requirements. The terms and definitions in Clause 3 are arranged in conceptual order, with an alphabetical index provided at the end of this document.

In this document, the following verbal forms 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.

Information marked as “NOTE” is for guidance in understanding or clarifying the associated requirement. “Notes to entry” used in Clause 3 provide additional information that supplements the terminological data and can contain provisions relating to the use of a term.

1 Scope

This document specifies requirements for an occupational health and safety (OH&S) management system, and gives guidance for its use, to enable organizations to provide safe and healthy workplaces by preventing work-related injury and ill health, as well as by proactively improving its OH&S performance.

This document is applicable to any organization that wishes to establish, implement and maintain an OH&S management system to improve occupational health and safety, eliminate hazards and minimize OH&S risks (including system deficiencies), take advantage of OH&S opportunities, and address OH&S management system nonconformities associated with its activities.

This document helps an organization to achieve the intended outcomes of its OH&S management system. Consistent with the organization’s OH&S policy, the intended outcomes of an OH&S management system include:

- a) continual improvement of OH&S performance;
- b) fulfilment of legal requirements and other requirements;
- c) achievement of OH&S objectives.

This document is applicable to any organization regardless of its size, type and activities. It is applicable to the OH&S risks under the organization's control, taking into account factors such as the context in which the organization operates and the needs and expectations of its workers and other interested parties.

This document does not state specific criteria for OH&S performance, nor is it prescriptive about the design of an OH&S management system.

This document enables an organization, through its OH&S management system, to integrate other aspects of health and safety, such as worker wellness/wellbeing.

This document does not address issues such as product safety, property damage or environmental impacts, beyond the risks to workers and other relevant interested parties.

This document can be used in whole or in part to systematically improve occupational health and safety management. However, claims of conformity to this document are not acceptable unless all its requirements are incorporated into an organization's OH&S management system and fulfilled without exclusion.

2 Normative references

There are no normative references in this document.

3 Terms and definitions

For the purposes of this document, the following terms and definitions apply.

ISO and IEC maintain terminological databases for use in standardization at the following addresses:

- ISO Online browsing platform: available at <https://www.iso.org/obp>
- IEC Electropedia: available at <http://www.electropedia.org/>

3.1 organization

person or group of people that has its own functions with responsibilities, authorities and relationships to achieve its objectives (3.16)

Note 1 to entry: The concept of organization includes, but is not limited to sole-trader, company, corporation, firm, enterprise, authority, partnership, charity or institution, or part or combination thereof, whether incorporated or not, public or private.

DNS/ISO 45001: 2018

Note 2 to entry: This constitutes one of the common terms and core definitions for ISO management system standards given in Annex SL of the Consolidated ISO Supplement to the ISO/IEC Directives, Part 1.

3.2 interested party (preferred term) **stakeholder** (admitted term)

person or *organization* (3.1) that can affect, be affected by, or perceive itself to be affected by a decision or activity

Note 1 to entry: This constitutes one of the common terms and core definitions for ISO management system standards given in Annex SL of the Consolidated ISO Supplement to the ISO/IEC Directives, Part 1.

3.3 worker

person performing work or work-related activities that are under the control of the organization (3.1)

Note 1 to entry: Persons perform work or work-related activities under various arrangements, paid or unpaid, such as regularly or temporarily, intermittently or seasonally, casually or on a part-time basis.

Note 2 to entry: Workers include top management (3.12), managerial and non-managerial persons.

Note 3 to entry: The work or work-related activities performed under the control of the organization may be performed by workers employed by the organization, workers of external providers, contractors, individuals, agency workers, and by other persons to the extent the organization shares control over their work or work-related activities, according to the context of the organization.

3.4 participation involvement in decision-making

Note 1 to entry: Participation includes engaging health and safety committees and workers' representatives, where they exist.

3.5 consultation seeking views before making a decision

Note 1 to entry: Consultation includes engaging health and safety committees and workers' representatives, where they exist.

3.6 workplace place under the control of the *organization* (3.1) where a person needs to be or to go for work purposes

Note 1 to entry: The organization's responsibilities under the OH&S management system (3.11) for the workplace depend on the degree of control over the workplace.

3.7 contractor external *organization* (3.1) providing services to the organization in accordance with agreed specifications, terms and conditions

Note 1 to entry: Services may include construction activities, among others.

3.8 requirement need or expectation that is stated, generally implied or obligatory

Note 1 to entry: "Generally implied" means that it is custom or common practice for the *organization* (3.1) and *interested parties* (3.2) that the need or expectation under consideration is implied.

Note 2 to entry: A specified requirement is one that is stated, for example in *documented information* (3.24).

Note 3 to entry: This constitutes one of the common terms and core definitions for ISO management system standards given in Annex SL of the Consolidated ISO Supplement to the ISO/IEC Directives, Part 1.

3.9 legal requirements and other requirements

legal requirements that an *organization* (3.1) has to comply with and other *requirements* (3.8) that an organization has to or chooses to comply with

Note 1 to entry: For the purposes of this document, legal requirements and other requirements are those relevant to the *OH&S management system* (3.11).

Note 2 to entry: “Legal requirements and other requirements” include the provisions in collective agreements.

Note 3 to entry: Legal requirements and other requirements include those that determine the persons who are *workers*’ (3.3) representatives in accordance with laws, regulations, collective agreements and practices.

3.10 management system

set of interrelated or interacting elements of an *organization* (3.1) to establish *policies* (3.14) and *objectives* (3.16) and *processes* (3.25) to achieve those objectives

Note 1 to entry: A management system can address a single discipline or several disciplines.

Note 2 to entry: The system elements include the organization’s structure, roles and responsibilities, planning, operation, performance evaluation and improvement.

Note 3 to entry: The scope of a management system may include the whole of the organization, specific and identified functions of the organization, specific and identified sections of the organization, or one or more functions across a group of organizations.

Note 4 to entry: This constitutes one of the common terms and core definitions for ISO management system standards given in Annex SL of the Consolidated ISO Supplement to the ISO/IEC Directives, Part 1. Note 2 to entry has been modified to clarify some of the wider elements of a management system.

3.11 occupational health and safety management system OH&S management system

management system (3.10) or part of a management system used to achieve the *OH&S policy* (3.15)

Note 1 to entry: The intended outcomes of the OH&S management system are to prevent *injury and ill health* (3.18) to *workers* (3.3) and to provide safe and healthy *workplaces* (3.6).

Note 2 to entry: The terms “occupational health and safety” (OH&S) and “occupational safety and health” (OSH) have the same meaning.

3.12 top management

person or group of people who directs and controls an *organization* (3.1) at the highest level

Note 1 to entry: Top management has the power to delegate authority and provide resources within the organization, provided ultimate responsibility for the *OH&S management system* (3.11) is retained.

Note 2 to entry: If the scope of the *management system* (3.10) covers only part of an organization, then top management refers to those who direct and control that part of the organization.

DNS/ISO 45001: 2018

Note 3 to entry: This constitutes one of the common terms and core definitions for ISO management system standards given in Annex SL of the Consolidated ISO Supplement to the ISO/IEC Directives, Part 1. Note 1 to entry has been modified to clarify the responsibility of top management in relation to an OH&S management system.

3.13 effectiveness

extent to which planned activities are realized and planned results achieved

Note 1 to entry: This constitutes one of the common terms and core definitions for ISO management system standards given in Annex SL of the Consolidated ISO Supplement to the ISO/IEC Directives, Part 1.

3.14 policy

intentions and direction of an organization (3.1), as formally expressed by its top management (3.12)

Note 1 to entry: This constitutes one of the common terms and core definitions for ISO management system standards given in Annex SL of the Consolidated ISO Supplement to the ISO/IEC Directives, Part 1.

3.15 occupational health and safety policy

OH&S policy

policy (3.14) to prevent work-related injury and ill health (3.18) to workers (3.3) and to provide safe and healthy workplaces (3.6)

3.16 objective

result to be achieved

Note 1 to entry: An objective can be strategic, tactical, or operational.

Note 2 to entry: Objectives can relate to different disciplines (such as financial, health and safety, and environmental goals) and can apply at different levels (such as strategic, organization-wide, project, product and process (3.25)).

Note 3 to entry: An objective can be expressed in other ways, e.g. as an intended outcome, a purpose, an operational criterion, as an OH&S objective (3.17), or by the use of other words with similar meaning (e.g. aim, goal, or target).

Note 4 to entry: This constitutes one of the common terms and core definitions for ISO management system standards given in Annex SL of the Consolidated ISO Supplement to the ISO/IEC Directives, Part 1. The original Note 4 to entry has been deleted as the term "OH&S objective" has been defined separately in 3.17.

3.17 occupational health and safety objective

OH&S objective

objective (3.16) set by the organization (3.1) to achieve specific results consistent with the OH&S policy (3.15)

3.18 injury and ill health

adverse effect on the physical, mental or cognitive condition of a person

Note 1 to entry: These adverse effects include occupational disease, illness and death.

Note 2 to entry: The term "injury and ill health" implies the presence of injury or ill health, either on their own or in combination.

3.19 hazard

source with a potential to cause injury and ill health (3.18)

Note 1 to entry: Hazards can include sources with the potential to cause harm or hazardous situations, or circumstances with the potential for exposure leading to injury and ill health.

3.20 risk

effect of uncertainty

Note 1 to entry: An effect is a deviation from the expected — positive or negative.

Note 2 to entry: Uncertainty is the state, even partial, of deficiency of information related to, understanding or knowledge of, an event, its consequence, or likelihood.

Note 3 to entry: Risk is often characterized by reference to potential “events” (as defined in ISO Guide 73:2009, 3.5.1.3) and “consequences” (as defined in ISO Guide 73:2009, 3.6.1.3), or a combination of these.

Note 4 to entry: Risk is often expressed in terms of a combination of the consequences of an event (including changes in circumstances) and the associated “likelihood” (as defined in ISO Guide 73:2009, 3.6.1.1) of occurrence.

Note 5 to entry: In this document, where the term “risks and opportunities” is used this means OH&S risks (3.21), OH&S opportunities (3.22) and other risks and other opportunities for the management system.

Note 6 to entry: This constitutes one of the common terms and core definitions for ISO management system standards given in Annex SL of the Consolidated ISO Supplement to the ISO/IEC Directives, Part 1. Note 5 to entry has been added to clarify the term “risks and opportunities” for its use within this document.

3.21 occupational health and safety risk OH&S risk

combination of the likelihood of occurrence of a work-related hazardous event(s) or exposure(s) and the severity of injury and ill health (3.18) that can be caused by the event(s) or exposure(s)

3.22 occupational health and safety opportunity OH&S opportunity

circumstance or set of circumstances that can lead to improvement of OH&S performance (3.28)

3.23 competence

ability to apply knowledge and skills to achieve intended results

Note 1 to entry: This constitutes one of the common terms and core definitions for ISO management system standards given in Annex SL of the Consolidated ISO Supplement to the ISO/IEC Directives, Part 1.

3.24 documented information

information required to be controlled and maintained by an *organization* (3.1) and the medium on which it is contained

Note 1 to entry: Documented information can be in any format and media, and from any source.

Note 2 to entry: Documented information can refer to:

- a) the management system (3.10), including related processes (3.25);

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- b) information created in order for the organization to operate (documentation);
- c) evidence of results achieved (records).

Note 3 to entry: This constitutes one of the common terms and core definitions for ISO management system standards given in Annex SL of the Consolidated ISO Supplement to the ISO/IEC Directives, Part 1.

3.25 process

set of interrelated or interacting activities which transforms inputs into outputs

Note 1 to entry: This constitutes one of the common terms and core definitions for ISO management system standards given in Annex SL of the Consolidated ISO Supplement to the ISO/IEC Directives, Part 1.

3.26 procedure

specified way to carry out an activity or a process (3.25)

Note 1 to entry: Procedures may be documented or not.

[SOURCE: ISO 9000:2015, 3.4.5, modified — Note 1 to entry has been modified.]

3.27 performance

measurable result

Note 1 to entry: Performance can relate either to quantitative or qualitative findings. Results can be determined and evaluated by qualitative or quantitative methods.

Note 2 to entry: Performance can relate to the management of activities, processes (3.25), products (including services), systems or organizations (3.1).

Note 3 to entry: This constitutes one of the common terms and core definitions for ISO management system standards given in Annex SL of the Consolidated ISO Supplement to the ISO/IEC Directives, Part 1. Note 1 to entry has been modified to clarify the types of methods that may be used for determining and evaluating results.

3.28 occupational health and safety performance

OH&S performance

performance (3.27) related to the effectiveness (3.13) of the prevention of injury and ill health (3.18) to workers (3.3) and the provision of safe and healthy workplaces (3.6)

3.29 outsource, verb

make an arrangement where an external organization (3.1) performs part of an organization's function or process (3.25)

Note 1 to entry: An external organization is outside the scope of the management system (3.10), although the outsourced function or process is within the scope.

Note 2 to entry: This constitutes one of the common terms and core definitions for ISO management system standards given in Annex SL of the Consolidated ISO Supplement to the ISO/IEC Directives, Part 1.

3.30 monitoring

determining the status of a system, a process (3.25) or an activity

Note 1 to entry: To determine the status, there may be a need to check, supervise or critically observe.

Note 2 to entry: This constitutes one of the common terms and core definitions for ISO management system standards given in Annex SL of the Consolidated ISO Supplement to the ISO/IEC Directives, Part 1.

3.31 measurement

process (3.25) to determine a value

Note 1 to entry: This constitutes one of the common terms and core definitions for ISO management system standards given in Annex SL of the Consolidated ISO Supplement to the ISO/IEC Directives, Part 1.

3.32 audit

systematic, independent and documented process (3.25) for obtaining audit evidence and evaluating it objectively to determine the extent to which the audit criteria are fulfilled

Note 1 to entry: An audit can be an internal audit (first party) or an external audit (second party or third party), and it can be a combined audit (combining two or more disciplines).

Note 2 to entry: An internal audit is conducted by the organization (3.1) itself, or by an external party on its behalf.

Note 3 to entry: “Audit evidence” and “audit criteria” are defined in ISO 19011.

Note 4 to entry: This constitutes one of the common terms and core definitions for ISO management system standards given in Annex SL of the Consolidated ISO Supplement to the ISO/IEC Directives, Part 1.

3.33 conformity

fulfilment of a requirement (3.8)

Note 1 to entry: This constitutes one of the common terms and core definitions for ISO management system standards given in Annex SL of the Consolidated ISO Supplement to the ISO/IEC Directives, Part 1.

3.34 nonconformity

non-fulfilment of a requirement (3.8)

Note 1 to entry: Nonconformity relates to requirements in this document and additional OH&S management system (3.11) requirements that an organization (3.1) establishes for itself.

Note 2 to entry: This constitutes one of the common terms and core definitions for ISO management system standards given in Annex SL of the Consolidated ISO Supplement to the ISO/IEC Directives, Part 1. Note 1 to entry has been added to clarify the relationship of nonconformities to the requirements of this document and to the organization’s own requirements for its OH&S management system.

3.35 incident

occurrence arising out of, or in the course of, work that could or does result in injury and ill health (3.18)

Note 1 to entry: An incident where injury and ill health occurs is sometimes referred to as an “accident”.

Note 2 to entry: An incident where no injury and ill health occurs, but has the potential to do so, may be referred to as a “near-miss”, “near-hit” or “close call”.

Note 3 to entry: Although there can be one or more nonconformities (3.34) related to an incident, an incident can also occur where there is no nonconformity.

3.36 corrective action

action to eliminate the cause(s) of a nonconformity (3.34) or an incident (3.35) and to prevent recurrence

Note 1 to entry: This constitutes one of the common terms and core definitions for ISO management system standards given in Annex SL of the Consolidated ISO Supplement to the ISO/IEC Directives, Part 1. The definition has been modified to include reference to “incident”, as incidents are a key factor in occupational health and safety, yet the activities needed for resolving them are the same as for nonconformities, through corrective action.

3.37 continual improvement

recurring activity to enhance performance (3.27)

Note 1 to entry: Enhancing performance relates to the use of the OH&S management system (3.11) in order to achieve improvement in overall OH&S performance (3.28) consistent with the OH&S policy (3.15) and OH&S objectives (3.17).

Note 2 to entry: Continual does not mean continuous, so the activity does not need to take place in all areas simultaneously.

Note 3 to entry: This constitutes one of the common terms and core definitions for ISO management system standards given in Annex SL of the Consolidated ISO Supplement to the ISO/IEC Directives, Part 1. Note 1 to entry has been added to clarify the meaning of “performance” in the context of an OH&S management system; Note 2 to entry has been added to clarify the meaning of “continual”.

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Annex A (informative)

Guidance on the use of this document

A.1 General

The explanatory information given in this annex is intended to prevent misinterpretation of the requirements contained in this document. While this information addresses and is consistent with these requirements, it is not intended to add to, subtract from, or in any way modify them.

The requirements in this document need to be viewed from a systems perspective and should not be taken in isolation, i.e. there can be an interrelationship between the requirements in one clause with the requirements in other clauses.

A.2 Normative references

There are no normative references in this document. Users can refer to the documents listed in the Bibliography for further information on OH&S guidelines and other ISO management system standards.

A.3 Terms and definitions

In addition to the terms and definitions given in Clause 3, and in order to avoid misunderstanding, clarifications of selected concepts are provided below.

- a) “Continual” indicates duration that occurs over a period of time, but with intervals of interruption (unlike “continuous”, which indicates duration without interruption). “Continual” is therefore the appropriate word to use in the context of improvement.
- b) The word “consider” means it is necessary to think about but can be excluded, whereas “take into account” means it is necessary to think about but cannot be excluded.
- c) The words “appropriate” and “applicable” are not interchangeable. “Appropriate” means suitable (for, to) and implies some degree of freedom, while “applicable” means relevant or possible to apply and implies that if it can be done, it shall be done.
- d) This document uses the term “interested party”; the term “stakeholder” is a synonym as it represents the same concept.
- e) The word “ensure” means the responsibility can be delegated, but not the accountability to make sure that an action is performed.
- f) “Documented information” is used to include both documents and records. This document uses the phrase “retain documented information as evidence of...” to mean

records, and “shall be maintained as documented information” to mean documents, including procedures. The phrase “to retain documented information as evidence of...” is not intended to require that the information retained will meet legal evidentiary requirements. Instead, it is intended to define the type of records that need to be retained.

- g) Activities that are “under the shared control of the organization” are activities for which the organization shares control over the means or methods, or shares direction of the work performed with respect to its OH&S performance, consistent with its legal requirements and other requirements.

Organizations can be subject to requirements related to the OH&S management system that mandate the use of specific terms and their meaning. If these other terms are used, conformity to this document is still required.

A.4 Context of the organization

A.4.1 Understanding the organization and its context

An understanding of the context of an organization is used to establish, implement, maintain and continually improve its OH&S management system. Internal and external issues can be positive or negative and include conditions, characteristics or changing circumstances that can affect the OH&S management system, for example:

- a) external issues, such as:
 - 1) the cultural, social, political, legal, financial, technological, economic and natural surroundings and market competition, whether international, national, regional or local;
 - 2) introduction of new competitors, contractors, subcontractors, suppliers, partners and providers, new technologies, new laws and the emergence of new occupations;
 - 3) new knowledge on products and their effect on health and safety
 - 4) key drivers and trends relevant to the industry or sector having impact on the organization;
 - 5) relationships with, as well as perceptions and values of, its external interested parties;
 - 6) changes in relation to any of the above;
- b) internal issues, such as:
 - 1) governance, organizational structure, roles and accountabilities;
 - 2) policies, objectives and the strategies that are in place to achieve them;

- 3) the capabilities, understood in terms of resources, knowledge and competence (e.g. capital, time, human resources, processes, systems and technologies);
- 4) information systems, information flows and decision-making processes (both formal and informal);
- 5) introduction of new products, materials, services, tools, software, premises and equipment;
- 6) relationships with, as well as perceptions and values of, workers;
- 7) the culture in the organization;
- 8) standards, guidelines and models adopted by the organization;
- 9) the form and extent of contractual relationships, including, for example, outsourced activities;
- 10) working time arrangements;
- 11) working conditions;
- 12) changes in relation to any of the above.

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

Interested parties, in addition to workers, can include:

- a) legal and regulatory authorities (local, regional, state/provincial, national or international);
- b) parent organizations;
- c) suppliers, contractors and subcontractors;
- d) workers' representatives;
- e) workers' organizations (trade unions) and employers' organizations;
- f) owners, shareholders, clients, visitors, local community and neighbours of the organization and the general public;
- g) customers, medical and other community services, media, academia, business associations and non-governmental organizations (NGOs);
- h) occupational health and safety organizations, occupational safety and health-care professionals.

Some needs and expectations are mandatory; for example, because they have been incorporated into laws and regulations. The organization may also decide to voluntarily agree to, or adopt, other needs and expectations (e.g. subscribing to a voluntary initiative). Once the organization adopts them, they are addressed when planning and establishing the OH&S management system.

A.4.3 Determining the scope of the OH&S management system

An organization has the freedom and flexibility to define the boundaries and applicability of the OH&S management system. The boundaries and applicability may include the whole organization, or a specific part(s) of the organization, provided that the top management of that part of the organization has its own functions, responsibilities and authorities for establishing an OH&S management system.

The credibility of the organization's OH&S management system will depend upon the choice of the boundaries. The scope should not be used to exclude activities, products and services that have or can impact the organization's OH&S performance, or to evade its legal requirements and other requirements. The scope is a factual and representative statement of the organization's operations included within its OH&S management system boundaries that should not mislead interested parties.

A.4.4 OH&S management system

The organization retains the authority, accountability and autonomy to decide how it will fulfil the requirements of this document, including the level of detail and extent to which it:

- a) establishes one or more processes to have confidence that they are controlled, carried out as planned and achieve the intended outcomes of the OH&S management system;
- b) integrates requirements of the OH&S management system into its various business processes (e.g. design and development, procurement, human resources, sales and marketing).

If this document is implemented for a specific part(s) of an organization, the policies and processes developed by other parts of the organization can be used to meet the requirements of this document, provided that they are applicable to the specific part(s) that will be subject to them and that they conform to the requirements of this document. Examples include corporate OH&S policies, education, training and competency programmes, and procurement controls.

A.5 Leadership and worker participation

A.5.1 Leadership and commitment

Leadership and commitment from the organization's top management, including awareness, responsiveness, active support and feedback, are critical for the success of the OH&S management system and achievement of its intended outcomes; therefore, top management has specific responsibilities for which they need to be personally involved or which they need to direct.

A culture that supports an organization's OH&S management system is largely determined by top management and is the product of individual and group values, attitudes, managerial practices, perceptions, competencies and patterns of activities that determine the commitment to, and the style and proficiency of, its OH&S management system. It is characterized by, but not limited to, active participation of workers, cooperation and communications founded on mutual trust, shared perceptions of the importance of the OH&S management system by active involvement in detection of OH&S opportunities and confidence in the effectiveness of preventive and protective measures. An important way top management demonstrates leadership is by encouraging workers to report incidents, hazards, risks and opportunities and by protecting workers against reprisals, such as the threat of dismissal or disciplinary action, when they do so.

A.5.2 OH&S policy

The OH&S policy is a set of principles stated as commitments in which top management outlines the long-term direction of the organization to support and continually improve its OH&S performance. The OH&S policy provides an overall sense of direction, as well as a framework for the organization to set its objectives and take actions to achieve the intended outcomes of the OH&S management system.

These commitments are then reflected in the processes an organization establishes to ensure a robust, credible and reliable OH&S management system (including addressing the specific requirements in this document).

The term "minimize" is used in relation to OH&S risks to set out the organization's aspirations for its OH&S management system. The term "reduce" is used to describe the process to achieve this.

In developing its OH&S policy, an organization should consider its consistency and coordination with other policies.

A.5.3 Organizational roles, responsibilities and authorities

Those involved in the organization's OH&S management system should have a clear understanding of their role, responsibility(ies) and authority(ies) for achieving the intended outcomes of the OH&S management system.

While top management has overall responsibility and authority for the OH&S management system, every person in the workplace needs to take account not only of their own health and safety, but also the health and safety of others.

Top management being accountable means being answerable for decisions and activities to the organization's governing bodies, legal authorities and, more broadly, its interested parties. It means having ultimate responsibility and relates to the person who is held to account if something is not done, is not done properly, does not work or fails to achieve its objective.

Workers should be enabled to report about hazardous situations so that action can be taken. They should be able to report concerns to responsible authorities as required, without the threat of dismissal, disciplinary action or other such reprisals.

The specific roles and responsibilities identified in 5.3 may be assigned to an individual, shared by several individuals, or assigned to a member of top management.

A.5.4 Consultation and participation of workers

The consultation and participation of workers, and, where they exist, workers' representatives, can be key factors of success for an OH&S management system and should be encouraged through the processes established by the organization.

Consultation implies a two-way communication involving dialogue and exchanges. Consultation involves the timely provision of the information necessary for workers, and, where they exist, workers' representatives, to give informed feedback to be considered by the organization before making a decision.

Participation enables workers to contribute to decision-making processes on OH&S performance measures and proposed changes.

Feedback on the OH&S management system is dependent upon worker participation. The organization should ensure workers at all levels are encouraged to report hazardous situations, so that preventive measures can be put in place and corrective action taken.

The reception of suggestions will be more effective if workers do not fear the threat of dismissal, disciplinary action or other such reprisals when making them.

A.6 Planning

A.6.1 Actions to address risks and opportunities

A.6.1.1 General

Planning is not a single event, but an ongoing process, anticipating changing circumstances and continually determining risks and opportunities, both for the workers and for the OH&S management system.

Undesired effects can include work-related injury and ill health, noncompliance with legal requirements and other requirements, or damage to reputation.

Planning considers the relationships and interactions between the activities and requirements for the management system as a whole.

OH&S opportunities address the identification of hazards, how they are communicated, and the analysis and mitigation of known hazards. Other opportunities address system improvement strategies.

Examples of opportunities to improve OH&S performance:

- a) inspection and auditing functions;
- b) job hazard analysis (job safety analysis) and task-related assessments;

- c) improving OH&S performance by alleviating monotonous work or work at a potentially hazardous pre-determined work rate;
- d) permit to work and other recognition and control methods;
- e) incident or nonconformity investigations and corrective actions;
- f) ergonomic and other injury prevention-related assessments.

Examples of other opportunities to improve OH&S performance:

- integrating occupational health and safety requirements at the earliest stage in the life cycle of facilities, equipment or process planning for facilities relocation, process re-design or replacement of machinery and plant;
- integrating occupational health and safety requirements at the earliest stage of planning for facilities relocation, process re-design or replacement of machinery and plant;
- using new technologies to improve OH&S performance;
- improving the occupational health and safety culture, such as by extending competence related to occupational health and safety beyond requirements or encouraging workers to report incidents in a timely manner;
- improving the visibility of top management's support for the OH&S management system;
- enhancing the incident investigation process(es);
- improving the process(es) for worker consultation and participation;
- benchmarking, including consideration of both the organization's own past performance and that of other organizations;
- collaborating in forums that focus on topics dealing with occupational health and safety.

A.6.1.2 Hazard identification and assessment of risks and opportunities

A.6.1.2.1 Hazard identification

The ongoing proactive identification of hazard begins at the conceptual design stage of any new workplace, facility, product or organization. It should continue as the design is detailed and then comes into operation, as well as being ongoing during its full life cycle to reflect current, changing and future activities.

While this document does not address product safety (i.e. safety to end-users of products), hazards to workers occurring during manufacture, construction, assembly or testing of products should be considered.

DNS/ISO 45001: 2018

Hazard identification helps the organization recognize and understand the hazards in the workplace and to workers, in order to assess, prioritize and eliminate hazards or reduce OH&S risks.

Hazards can be physical, chemical, biological, psychosocial, mechanical, electrical or based on movement and energy.

The list given in 6.1.2.1 is not exhaustive.

NOTE The numbering of the following list items a) to f) does not correspond exactly to the numbering of the list items given in 6.1.2.1.

The organization's hazard identification process(es) should consider:

- a) routine and non-routine activities and situations:
 - 1) routine activities and situations create hazards through day-to-day operations and normal work activities;
 - 2) non-routine activities and situations are occasional or unplanned;
 - 3) short-term or long-term activities can create different hazards;
- b) human factors:
 - 1) relate to human capabilities, limitations and other characteristics;
 - 2) information should be applied to tools, machines, systems, activities and environment for safe, comfortable human use;
 - 3) should address three aspects: the activity, the worker and the organization, and how these interact with and impact on occupational health and safety;
- c) new or changed hazards:
 - 1) can arise when work processes are deteriorated, modified, adapted or evolved as a result of familiarity or changing circumstances;
 - 2) understanding how work is actually performed (e.g. observing and discussing hazards with workers) can identify if OH&S risks are increased or reduced;
- d) potential emergency situations:
 - 1) unplanned or unscheduled situations that require an immediate response (e.g. a machine catching fire in the workplace, or a natural disaster in the vicinity of the workplace or at another location where workers are performing work-related activities);
 - 2) include situations such as civil unrest at a location at which workers are performing work-related activities which requires their urgent evacuation;

- e) people:
 - 1) those in the vicinity of the workplace who could be affected by the activities of the organization (e.g. passers-by, contractors or immediate neighbours);
 - 2) workers at a location not under the direct control of the organization, such as mobile workers or workers who travel to perform work-related activities at another location (e.g. postal workers, bus drivers, service personnel travelling to and working at a customer's site);
 - 3) home-based workers, or those who work alone;
- f) changes in knowledge of, and information about, hazards:
 - 1) sources of knowledge, information and new understanding about hazards can include published literature, research and development, feedback from workers, and review of the organization's own operational experience;
 - 2) these sources can provide new information about the hazards and OH&S risks.

A.6.1.2.2 Assessment of OH&S risks and other risks to the OH&S management system

An organization can use different methods to assess OH&S risks as part of its overall strategy for addressing different hazards or activities. The method and complexity of assessment does not depend on the size of the organization, but on the hazards associated with the activities of the organization.

Other risks to the OH&S management system should also be assessed using appropriate methods.

Processes for the assessment of risk to the OH&S management system should consider day-to-day operations and decisions (e.g. peaks in work flow, restructuring) as well as external issues (e.g. economic change). Methodologies can include ongoing consultation of workers affected by day-to-day activities (e.g. changes in work load), monitoring and communication of new legal requirements and other requirements (e.g. regulatory reform, revisions to collective agreements regarding occupational health and safety), and ensuring resources meet existing and changing needs (e.g. training on, or procurement of, new improved equipment or supplies).

A.6.1.2.3 Assessment of OH&S opportunities and other opportunities for the OH&S management system

The process for assessment should consider the OH&S opportunities and other opportunities determined, their benefits and potential to improve OH&S performance.

A.6.1.3 Determination of legal requirements and other requirements

- a) Legal requirements can include:

- 1) legislation (national, regional or international), including statutes and regulations;
 - 2) decrees and directives;
 - 3) orders issued by regulators;
 - 4) permits, licences or other forms of authorization;
 - 5) judgments of courts or administrative tribunals;
 - 6) treaties, conventions, protocols;
 - 7) collective bargaining agreements.
- b) Other requirements can include:
- 1) the organization's requirements;
 - 2) contractual conditions;
 - 3) employment agreements;
 - 4) agreements with interested parties;
 - 5) agreements with health authorities;
 - 6) non-regulatory standards, consensus standards and guidelines;
 - 7) voluntary principles, codes of practice, technical specifications, charters;
 - 8) public commitments of the organization or its parent organization.

A.6.1.4 Planning action

The actions planned should primarily be managed through the OH&S management system and should involve integration with other business processes, such as those established for the management of the environment, quality, business continuity, risk, financial or human resources. The implementation of the actions taken is expected to achieve the intended outcomes of the OH&S management system.

When the assessment of OH&S risks and other risks has identified the need for controls, the planning activity determines how these are implemented in operation (see Clause 8); for example, determining whether to incorporate these controls into work instructions or into actions to improve competence. Other controls can take the form of measuring or monitoring (see Clause 9).

Actions to address risks and opportunities should also be considered under the management of change (see 8.1.3) to ensure there are no resulting unintended consequences.

A.6.2 OH&S objectives and planning to achieve them

A.6.2.1 OH&S objectives

Objectives are established to maintain and improve OH&S performance. The objectives should be linked to risks and opportunities and performance criteria which the organization has identified as being necessary for the achievement of the intended outcomes of the OH&S management system.

OH&S objectives can be integrated with other business objectives and should be set at relevant functions and levels. Objectives can be strategic, tactical or operational:

- a) strategic objectives can be set to improve the overall performance of the OH&S management system (e.g. to eliminate noise exposure);
- b) tactical objectives can be set at facility, project or process level (e.g. to reduce noise at source);
- c) operational objectives can be set at the activity level (e.g. the enclosure of individual machines to reduce noise).

The measurement of OH&S objectives can be qualitative or quantitative. Qualitative measures can be approximations, such as those obtained from surveys, interviews and observations. The organization is not required to establish OH&S objectives for every risk and opportunity it determines.

A.6.2.2 Planning to achieve OH&S objectives

The organization can plan to achieve objectives individually or collectively. Plans can be developed for multiple objectives where necessary.

The organization should examine the resources required (e.g. financial, human, equipment, infrastructure) to achieve its objectives.

When practicable, each objective should be associated with an indicator which can be strategic, tactical or operational.

A.7 Support

A.7.1 Resources

Examples of resources include human, natural, infrastructure, technology and financial.

Examples of infrastructure include the organization's buildings, plant, equipment, utilities, information technology and communications systems, and emergency containment systems.

A.7.2 Competence

The competence of workers should include the knowledge and skills needed to appropriately identify the hazards and deal with the OH&S risks associated with their work and workplace.

In determining the competence for each role, the organization should take into account things such as:

- a) the education, training, qualification and experience necessary to undertake the role and the re-training necessary to maintain competence;
- b) the work environment;
- c) the preventive and control measures resulting from the risk assessment process(es);
- d) the requirements applicable to the OH&S management system;
- e) legal requirements and other requirements;
- f) the OH&S policy;
- g) the potential consequences of compliance and noncompliance, including the impact on the worker's health and safety;
- h) the value of participation of workers in the OH&S management system based on their knowledge and skill;
- i) the duties and responsibilities associated with the roles;
- j) individual capabilities, including experience, language skills, literacy and diversity;
- k) the relevant updating of the competence made necessary by context or work changes.

Workers can assist the organization in determining the competence needed for roles.

Workers should have the necessary competence to remove themselves from situations of imminent and serious danger. For this purpose, it is important that workers are provided with sufficient training on hazards and risks associated with their work.

As appropriate, workers should receive the training required to enable them to carry out their representative functions for occupational health and safety effectively.

In many countries, it is a legal requirement to provide training at no cost to workers.

A.7.3 Awareness

In addition to workers (especially temporary workers), contractors, visitors and any other parties should be aware of the OH&S risks to which they are exposed.

A.7.4 Communication

The communication process(es) established by the organization should provide for the gathering, updating and dissemination of information. It should ensure that relevant information is provided, is received and is understandable to all relevant workers and interested parties.

A.7.5 Documented information

It is important to keep the complexity of the documented information at the minimum level possible to ensure effectiveness, efficiency and simplicity at the same time.

This should include documented information regarding planning to address legal requirements and other requirements and on evaluations of the effectiveness of these actions.

The actions described in 7.5.3 are particularly aimed at preventing unintended use of obsolete documented information.

Examples of confidential information include personal and medical information.

A.8 Operation

A.8.1 Operational planning and control

A.8.1.1 General

Operational planning and control of the processes need to be established and implemented as necessary to enhance occupational health and safety, by eliminating hazards or, if not practicable, by reducing the OH&S risks to levels as low as reasonably practicable for operational areas and activities.

Examples of operational control of the processes include:

- a) the use of procedures and systems of work;
- b) ensuring the competence of workers;
- c) establishing preventive or predictive maintenance and inspection programmes;
- d) specifications for the procurement of goods and services;
- e) application of legal requirements and other requirements, or manufacturers' instructions for equipment;
- f) engineering and administrative controls;
- g) adapting work to workers; for example, by:
 - 1) defining, or redefining, how the work is organized;

- 2) the induction of new workers;
- 3) defining, or redefining, processes and working environments;
- 4) using ergonomic approaches when designing new, or modifying, workplaces, equipment, etc.

A.8.1.2 Eliminating hazards and reducing OH&S risks

The hierarchy of controls is intended to provide a systematic approach to enhance occupational health and safety, eliminate hazards, and reduce or control OH&S risks. Each control is considered less effective than the one before it. It is usual to combine several controls in order to succeed in reducing the OH&S risks to a level that is as low as reasonably practicable.

The following examples are given to illustrate measures that can be implemented at each level.

- a) Elimination: removing the hazard; stopping using hazardous chemicals; applying ergonomics approaches when planning new workplaces; eliminating monotonous work or work that causes negative stress; removing fork-lift trucks from an area.
- b) Substitution: replacing the hazardous with less hazardous; changing to answering customer complaints with online guidance; combating OH&S risks at source; adapting to technical progress (e.g. replacing solvent-based paint by water-based paint; changing slippery floor material; lowering voltage requirements for equipment).
- c) Engineering controls, reorganization of work, or both: isolating people from hazard; implementing collective protective measures (e.g. isolation, machine guarding, ventilation systems); addressing mechanical handling; reducing noise; protecting against falls from height by using guard rails; reorganizing work to avoid people working alone, unhealthy work hours and workload, or to prevent victimization.
- d) Administrative controls including training: conducting periodic safety equipment inspections; conducting training to prevent bullying and harassment; managing health and safety coordination with subcontractors' activities; conducting induction training; administering forklift driving licences; providing instructions on how to report incidents, nonconformities and victimization without fear of retribution; changing the work patterns (e.g. shifts) of workers; managing a health or medical surveillance programme for workers who have been identified as at risk (e.g. related to hearing, hand-arm vibration, respiratory disorders, skin disorders or exposure); giving appropriate instructions to workers (e.g. entry control processes).
- e) Personal protective equipment (PPE): providing adequate PPE, including clothing and instructions for PPE utilization and maintenance (e.g. safety shoes, safety glasses, hearing protection, gloves).

A.8.1.3 Management of change

The objective of a management of change process is to enhance occupational health and safety at work, by minimizing the introduction of new hazards and OH&S risks into the work environment as changes occur (e.g. with technology, equipment, facilities, work practices and procedures, design specifications, raw materials, staffing, standards or regulations). Depending on the nature of an expected change, the organization can use an appropriate methodology(ies) (e.g. design review) for assessing the OH&S risks and the OH&S opportunities of the change. The need to manage change can be an outcome of planning (see 6.1.4).

A.8.1.4 Procurement

A.8.1.4.1 General

The procurement process(es) should be used to determine, assess and eliminate hazards, and to reduce OH&S risks associated with, for example, products, hazardous materials or substances, raw materials, equipment, or services before their introduction into the workplace.

The organization's procurement process(es) should address requirements including, for example, supplies, equipment, raw materials, and other goods and related services purchased by the organization to conform to the organization's OH&S management system. The process should also address any needs for consultation (see 5.4) and communication (see 7.4).

The organization should verify that equipment, installations and materials are safe for use by workers by ensuring:

- a) equipment is delivered according to specification and is tested to ensure it works as intended;
- b) installations are commissioned to ensure they function as designed;
- c) materials are delivered according to their specifications;
- d) any usage requirements, precautions or other protective measures are communicated and made available.

A.8.1.4.2 Contractors

The need for coordination recognizes that some contractors (i.e. external providers) possess specialized knowledge, skills, methods and means.

Examples of contractor activities and operations include maintenance, construction, operations, security, cleaning and a number of other functions. Contractors can also include consultants or specialists in administrative, accounting and other functions. Assignment of activities to contractors does not eliminate the organization's responsibility for the occupational health and safety of workers.

An organization can achieve coordination of its contractors' activities through the use of contracts that clearly define the responsibilities of the parties involved. An organization can use a variety of tools for ensuring contractors' OH&S performance in the workplace (e.g. contract award mechanisms or pre-qualification criteria which consider past health and safety performance, safety training, or health and safety capabilities, as well as direct contract requirements).

When coordinating with contractors, the organization should give consideration to the reporting of hazards between itself and its contractors, controlling worker access to hazardous areas, and procedures to follow in emergencies. The organization should specify how the contractor will coordinate its activities with the organization's own OH&S management system processes (e.g. those used for controlling entry, for confined space entry, exposure assessment and process safety management) and for the reporting of incidents.

The organization should verify that contractors are capable of performing their tasks before being allowed to proceed with their work; for example, by verifying that:

- a) OH&S performance records are satisfactory;
- b) qualification, experience and competence criteria for workers are specified and have been met (e.g. through training);
- c) resources, equipment and work preparations are adequate and ready for the work to proceed.

A.8.1.4.3 Outsourcing

When outsourcing, the organization needs to have control of the outsourced functions and process(es) to achieve the intended outcome(s) of the OH&S management system. In the outsourced functions and process(es), the responsibility for conforming to the requirements of this document is retained by the organization.

The organization should establish the extent of control over outsourced function(s) or process(es) based upon factors such as:

- the ability of the external organization to meet the organization's OH&S management system requirements;
- the technical competence of the organization to define appropriate controls or assess the adequacy of controls;
- the potential effect the outsourced process or function will have on the organization's ability to achieve the intended outcome of its OH&S management system;
- the extent to which the outsourced process or function is shared;
- the capability of the organization to achieve the necessary control through the application of its procurement process;
- opportunities for improvement.

In some countries, legal requirements address outsourced functions or processes.

A.8.2 Emergency preparedness and response

Emergency preparedness plans can include natural, technical and man-made events that occur inside and outside normal working hours.

A.9 Performance evaluation

A.9.1 Monitoring, measurement, analysis and performance evaluation

A.9.1.1 General

In order to achieve the intended outcomes of the OH&S management system, the processes should be monitored, measured and analysed.

- a) Examples of what could be monitored and measured can include, but are not limited to:
 - 1) occupational health complaints, health of workers (through surveillance) and work environment;
 - 2) work-related incidents, injuries and ill health, and complaints, including trends;
 - 3) the effectiveness of operational controls and emergency exercises, or the need to modify or introduce new controls;
 - 4) competence.
- b) Examples of what could be monitored and measured to evaluate the fulfilment of legal requirements can include, but are not limited to:
 - 1) identified legal requirements (e.g. whether all legal requirements have been determined, and whether the organization's documented information of them is kept up-to-date);
 - 2) collective agreements (when legally binding);
 - 3) the status of identified gaps in compliance.
- c) Examples of what could be monitored and measured to evaluate the fulfilment of other requirements can include, but are not limited to:
 - 1) collective agreements (when not legally binding);
 - 2) standards and codes;
 - 3) corporate and other policies, rules and regulations;

- 4) insurance requirements.
- d) Criteria are what the organization can use to compare its performance against.
 - 1) Examples are benchmarks against:
 - i) other organizations;
 - ii) standards and codes;
 - iii) the organization's own codes and objectives;
 - iv) OH&S statistics.
 - 2) To measure criteria, indicators are typically used; for example:
 - i) if the criterion is a comparison of incidents, the organization may choose to look at frequency, type, severity or number of incidents; then the indicator could be the determined rate within each one of these criteria;
 - ii) if the criterion is a comparison of completions of corrective actions, then the indicator could be the percentage completed on time.

Monitoring can involve continual checking, supervising, critically observing or determining the status in order to identify change from the performance level required or expected. Monitoring can be applied to the OH&S management system, to processes or to controls.

Examples include the use of interviews, reviews of documented information and observations of work being performed.

Measurement generally involves the assignment of numbers to objects or events. It is the basis for quantitative data and is generally associated with the performance evaluation of safety programmes and health surveillance. Examples include the use of calibrated or verified equipment to measure exposure to a hazardous substance or the calculation of the safe distance from a hazard.

Analysis is the process of examining data to reveal relationships, patterns and trends. This can mean the use of statistical operations, including information from other similar organizations, to help draw conclusions from the data. This process is most often associated with measurement activities.

Performance evaluation is an activity undertaken to determine the suitability, adequacy and effectiveness of the subject matter to achieve the established objectives of the OH&S management system.

A.9.1.2 Evaluation of compliance

The frequency and timing of compliance evaluations can vary depending on the importance of the requirement, variations in operating conditions, changes in legal requirements and

other requirements and the organization's past performance. An organization can use a variety of methods to maintain its knowledge and understanding of its compliance status.

A.9.2 Internal audit

The extent of the audit programme should be based on the complexity and level of maturity of the OH&S management system.

An organization can establish objectivity and impartiality of the internal audit by creating a process(es) that separates auditors' roles as internal auditors from their normal assigned duties, or the organization can also use external people for this function.

A.9.3 Management review

The terms used in relation to management review should be understood as follows:

- a) "suitability" refers to how the OH&S management system fits the organization, its operation, its culture and business systems;
- b) "adequacy" refers to whether the OH&S management system is implemented appropriately;
- c) "effectiveness" refers to whether the OH&S management system is achieving the intended outcome.

The management review topics listed in 9.3 a) to g) need not be addressed all at once; the organization should determine when and how the management review topics are addressed.

A.10 Improvement

A.10.1 General

The organization should consider the results from analysis and evaluation of OH&S performance, evaluation of compliance, internal audits and management review when taking action to improve.

Examples of improvement include corrective action, continual improvement, breakthrough change, innovation and re-organization.

A.10.2 Incident, nonconformity and corrective action

Separate processes may exist for incident investigations and nonconformities reviews, or these may be combined as a single process, depending on the organization's requirements.

Examples of incidents, nonconformities and corrective actions can include, but are not limited to:

- a) incidents: same level fall with or without injury; broken leg; asbestosis; hearing loss; damage to buildings or vehicles where they can lead to OH&S risks;

- b) nonconformities: protective equipment not functioning properly; failure to fulfil legal requirements and other requirements; prescribed procedures not being followed;
- c) corrective actions (as indicated by the hierarchy of controls; see 8.1.2): eliminating hazards; substituting with less hazardous materials; redesigning or modifying equipment or tools; developing procedures; improving the competence of affected workers; changing the frequency of use; using personal protective equipment.

Root cause analysis refers to the practice of exploring all the possible factors associated with an incident or nonconformity by asking what happened, how it happened and why it happened, to provide the input for what can be done to prevent it from happening again.

When determining the root cause of an incident or nonconformity, the organization should use methods appropriate to the nature of the incident or nonconformity being analysed. The focus of root cause analysis is prevention. This analysis can identify multiple contributory failures, including factors related to communication, competence, fatigue, equipment or procedures.

Reviewing the effectiveness of corrective actions [see 10.2 f)] refers to the extent to which the implemented corrective actions adequately control the root cause(s).

A.10.3 Continual improvement

Examples of continual improvement issues include, but are not limited to:

- a) new technology;
- b) good practices, both internal and external to the organization;
- c) suggestions and recommendations from interested parties;
- d) new knowledge and understanding of occupational health and safety-related issues;
- e) new or improved materials;
- f) changes in worker capabilities or competence;
- g) achieving improved performance with fewer resources (i.e. simplification, streamlining, etc.).

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Alphabetical index of terms

audit 3.32
competence 3.23
conformity 3.33
consultation 3.5
continual improvement 3.37
contractor 3.7
corrective action 3.36
documented information 3.24
effectiveness 3.13
hazard 3.19
incident 3.35
injury and ill health 3.18
interested party 3.2
legal requirements and other requirements 3.9
management system 3.10
measurement 3.31
monitoring 3.30
nonconformity 3.34
objective 3.16
occupational health and safety management system 3.11
OH&S management system
occupational health and safety objective 3.17
OH&S objective
occupational health and safety opportunity 3.22
OH&S opportunity
occupational health and safety performance 3.28
OH&S performance
occupational health and safety policy 3.15
OH&S policy
occupational health and safety risk 3.21
OH&S risk
organization 3.1
outsource, verb 3.29
participation 3.4
performance 3.27
policy 3.14
procedure 3.26
process 3.25
requirement 3.8
risk 3.20
top management 3.12
worker 3.3
workplace 3.6