

BS 18004:2008



BSI Standards Publication

Guide to achieving effective occupational health and safety performance

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Summary of pages

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Foreword

Publishing information

This British Standard was published by BSI and came into effect on 30 November 2008. It was prepared by Technical Committee HS/1, *Occupational health and safety management*. A list of organizations represented on this committee can be obtained on request to its secretary.

Relationship with other documents

BS 18004:2008 supersedes BS 8800:2004, which is withdrawn.

BS 18004 is one of three related documents on occupational health and safety management systems published by the BSI since June 2007. The first was BS OHSAS 18001:2007, which specifies what an organization needs to have in place to meet the criteria for occupational health and safety management.

BS OHSAS 18001 is supported by BS OHSAS 18002:2008, which gives guidance on what an organization should consider when implementing and operating a system that meets the requirements of BS OHSAS 18001.

BS 18004:2008 gives good practice guidance on successful health and safety management, and builds on the guidance advocated in HSG 65 [1]. Structured around the OHSAS 18001 framework, it provides guidance in line with developments in OHS management within the UK and provides extensive annexes intended to support those organizations that wish to deliver good health and safety performance.

Use of this document

As a guide, BS 18004 takes the form of guidance and recommendations. It should not be quoted as if it were a specification and particular care should be taken to ensure that claims of compliance are not misleading.

Any user claiming compliance with BS 18004 is expected to be able to justify any course of action that deviates from its recommendations.

Presentational conventions

The provisions in this standard are presented in roman (i.e. upright) type. Its recommendations are expressed in sentences in which the principal auxiliary verb is "should".

Commentary, explanation and general informative material is presented in smaller italic type, and does not constitute a normative element.

Contractual and legal considerations

In the UK, and Europe generally, there are various legal requirements for occupational health and safety that apply to the potentially harmful effects of work activities and which extend beyond the workplace to those affected by workplace activities (see Note to 3.17 on the definition of occupational health and safety). It is essential

for the organization to take the matters addressed by these legal requirements into account in establishing, implementing and maintaining its OH&S management system – and in particular when identifying hazards, assessing risks and determining controls (see **4.3.2** and **4.3.3**).

This publication does not purport to include all the necessary provisions of a contract. Users are responsible for its correct application.

Compliance with a British Standard cannot confer immunity from legal obligations.

1 Scope

This British Standard provides guidance for an occupational health and safety (OH&S) management system or the OH&S elements of an organization's overall management system, to enable an organization to control its OH&S risks and improve its OH&S performance. It does not state specific OH&S performance criteria, nor does it give detailed specifications for the design of a management system.

This guidance is applicable to any organization that wishes to:

- a) establish an OH&S management system to control risks to personnel and other interested parties who could be exposed to OH&S hazards associated with its activities, facilities, processes or plant;
- b) implement, maintain and continually improve an OH&S management system;
- c) demonstrate commitment to good practice, including self-regulation, and continual improvement in OH&S performance;
- d) assure itself of its conformity with its stated OH&S policy and with BS OHSAS 18001 by:
 - 1) making a self-determination and self-declaration; or
 - 2) seeking confirmation of its conformity by parties having an interest in the organization, such as customers; or
 - 3) seeking confirmation of its self-declaration by a party external to the organization; or
 - 4) seeking certification/registration of its OH&S management system by an external organization.

All elements in this standard are intended to be incorporated into any OH&S management system and to enable an organization to incorporate OH&S within its overall management system. The extent of the application will depend on such factors as the OH&S policy of the organization, the nature of its activities and the risks and complexity of its operations.

This standard is intended to address occupational health and safety, and is not intended to address other health and safety areas, such as worker wellbeing/wellness programmes, product safety, property damage or environmental impacts.

This standard is intended for use by organizations of all sizes, regardless of the nature of their activities. It is intended that its application is proportional to the circumstances and needs of the particular organization. Further guidance for small and medium enterprises (SMEs) will be provided in BS 18005, a new standard in preparation.

NOTE Annex A gives information about integrating a BS OHSAS 18001 management system within the overall business risk management system. Annex B and Annex C provide guidance on implementing, operating and promoting an effective OH&S management system. Annex D covers setting objectives and planning and implementing OH&S programmes. Annex E gives guidance on risk assessment and control and Annex F discusses operational control. Occupational health is discussed in Annex G, while Annex H provides advice on how to involve workers. Information on emergency preparedness and response is given in Annex I. Annex J discusses how to measure performance. Incident investigation is discussed in Annex K. Annex L gives guidance on the process of internal audit.

2 Reference publications

The following referenced documents are indispensable for the application of this document. For dated references, only the edition cited applies. For undated references, the latest edition of the referenced document (including any amendments) applies.

BS EN ISO 9000:2005, *Quality management systems — Fundamentals and vocabulary*

BS EN ISO 9001:2008, *Quality management systems — Requirements*

BS EN ISO 14001:2004, *Environmental management systems — Requirements with guidance for use*

BS EN ISO 19011:2002, *Guidelines for quality and/or environmental management systems auditing*

BS OHSAS 18001:2007, *Occupational health and safety management systems — Requirements*

BS OHSAS 18002, *Occupational health and safety management systems — Guidelines for the implementation of BS OHSAS 18001*

PAS 99, *Specification of common management system requirements as a framework for integration*

International Labour Organization:2001, *Guidelines on occupational health and safety management systems — ILO-OSH 2001*

3 Terms and definitions

For the purposes of this British Standard the following terms and definitions apply.

3.1 acceptable risk

risk (3.26) that has been reduced to a level that can be tolerated by the organization having regard to its legal obligations and its own OH&S policy (3.21)

3.2 accident

incident (3.13) giving rise to injury, ill health or fatality

3.3 audit

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

[BS EN ISO 9000:2005, 3.9.1]

NOTE 1 Independent does not necessarily mean external to the organization. In many cases, independence can be demonstrated by the freedom from responsibility for the activity being audited.

NOTE 2 For further guidance on "audit evidence" and "audit criteria" see BS EN ISO 19011.

3.4 competent person

person with the appropriate combination of skill, knowledge, qualifications and experience

3.5 continual improvement

recurring process of enhancing the OH&S management system (3.18) in order to achieve improvements in overall OH&S performance (3.20) consistent with the organization's (3.22) OH&S policy (3.21)

NOTE The process need not take place in all areas of activity simultaneously.

[BS EN ISO 14001:2004, 3.2. Modified]

3.6 corrective action

action to eliminate the cause of a detected nonconformity (3.16) or other undesirable situation

NOTE 1 There can be more than one cause for a nonconformity.

NOTE 2 Corrective action is taken to prevent recurrence whereas preventive action (3.23) is taken to prevent occurrence.

[BS EN ISO 9000:2005, 3.6.5]

3.7 document

information and its supporting medium

NOTE The medium can be paper, magnetic, electronic or optical computer disc, photograph or master sample, or a combination thereof.

[BS EN ISO 14001:2004, 3.4]

3.8 hazard

source, situation, or act with a potential for harm in terms of human injury or ill health (3.12), or a combination of these

3.9 hazard identification

process of recognizing that a hazard (3.8) exists and defining its characteristics

3.10 hazardous event

occurrence that results in, or has the potential to result in, an incident

NOTE This could include long-term exposure.

3.11 health surveillance

monitoring health of employees to detect signs or symptoms of work-related ill health (3.12) so that steps can be taken to eliminate, or reduce the probability of, further harm

3.12 ill health

identifiable, adverse physical or mental condition arising from and/or made worse by a work activity and/or work-related situation

NOTE This is sometimes referred to as occupational work-related ill health.

3.13 incident

work-related event(s) in which an injury or ill health (3.12) (regardless of severity) or fatality occurred, or could have occurred

NOTE 1 An accident (3.2) is an incident which has given rise to injury, ill health or fatality.

NOTE 2 An incident where no injury, ill health, or fatality occurs may also be referred to as a “near-miss”, “near-hit”, “close call” or “dangerous occurrence”.

NOTE 3 An emergency situation (see 4.4.8) is a particular type of incident.

3.14 integration

combining the elements of an OH&S management system with those of another, e.g. environmental management, system

3.15 interested party

person or group, inside or outside the workplace (3.34), concerned with or affected by the OH&S performance (3.20) of an organization (3.22)

NOTE Regulatory agencies, neighbours and emergency services are examples of interested parties.

3.16 nonconformity

non-fulfillment of a requirement

[BS EN ISO 9000:2005, 3.6.2; BS EN ISO 14001, 3.15]

NOTE A nonconformity can be any deviation from:

- relevant work standards, practices, procedures, legal requirements, etc.
- OH&S management system (3.18) criteria.

3.17 occupational health and safety (OH&S)

conditions and factors that affect, or could affect, the health and safety of employees or other workers (including temporary workers and contractor personnel), visitors and any other person in the workplace (3.34)

NOTE Organizations can be subject to legal requirements for the health and safety of persons beyond the immediate workplace, or who are exposed to the workplace activities.

3.18 OH&S management system

part of an organization's (3.22) management system used to develop and implement its OH&S policy (3.21) and manage its OH&S risks (3.26)

NOTE 1 A management system is a set of interrelated elements used to establish policy and objectives and to achieve those objectives.

NOTE 2 A management system includes organizational structure, planning activities (including for example, risk assessment and the setting of objectives), responsibilities, practices, procedures (3.24), processes and resources.

[BS EN ISO 14001:2004, 3.8. Modified]

3.19 OH&S objective

OH&S goal, in terms of OH&S performance (3.20) that an organization (3.22) sets itself to achieve

NOTE 1 Objectives should be quantified wherever practicable.

NOTE 2 4.3.4 states that OH&S objectives should be consistent with the OH&S policy (3.21).

3.20 OH&S performance

measurable results of an organization's (3.22) management of its OH&S risks (3.26)

NOTE 1 OH&S performance measurement includes measuring the effectiveness of the organization's controls.

NOTE 2 In the context of OH&S management systems (3.18), results can also be measured against the organization's (3.22) OH&S policy (3.21), OH&S objectives (3.19), and other OH&S performance criteria.

3.21 OH&S policy

overall intentions and direction of an organization (3.22) related to its OH&S performance (3.20) as formally expressed by top management

NOTE The OH&S policy provides a framework for action and for the setting of OH&S objectives (3.19).

[BS EN ISO 14001:2004, 3.11. Modified]

3.22 organization

company, corporation, firm, enterprise, authority or institution, or part or combination thereof, whether incorporated or not, public or private, that has its own functions and administration

NOTE For organizations with more than one operating unit, a single operating unit may be defined as an organization.

[BS EN ISO 14001:2004, 3.16]

3.23 preventive action

action to eliminate the cause of a potential nonconformity (3.16) or other undesirable potential situation

NOTE 1 There can be more than one cause for a potential nonconformity.

NOTE 2 Preventive action is taken to prevent occurrence whereas corrective action (3.6) is taken to prevent recurrence.

[BS EN ISO 9000:2005, 3.6.4]

3.24 procedure

specified way to carry out an activity or a process

NOTE Procedures can be documented or not.

[BS EN ISO 9000:2005, 3.4.5]

3.25 record

document (3.7) stating results achieved or providing evidence of activities performed

[BS EN ISO 14001:2004, 3.20]

3.26 risk

combination of the likelihood of an occurrence of a hazardous event or exposure(s) and the severity of injury or ill health (3.12) that can be caused by the event or exposure(s)

3.27 risk assessment

process of evaluating the risk(s) (3.26) arising from a hazard(s), taking into account the adequacy of any existing controls, and deciding whether or not the risk(s) is acceptable

3.28 risk control

selection and application of suitable measures to reduce risk

3.29 stakeholders

those with a vested interest in an organization's achievements

NOTE This is a wide-ranging term that includes, but is not limited to, internal and "outsourced" employees, customers, suppliers, partners, employees, distributors, investors, insurers, shareholders, owners, government and regulators.

3.30 status review

formal evaluation of the OH&S management system

3.31 top management

person or group of people who direct and control an organization at the highest level

[BS EN ISO 9000:2005]

3.32 health and safety culture

product of individual and group values, attitudes, competencies and patterns of behaviour that determine the commitment to, and the style and proficiency of, an organization's approach to health and safety

3.33 worker representative

representative of employee occupational health and safety

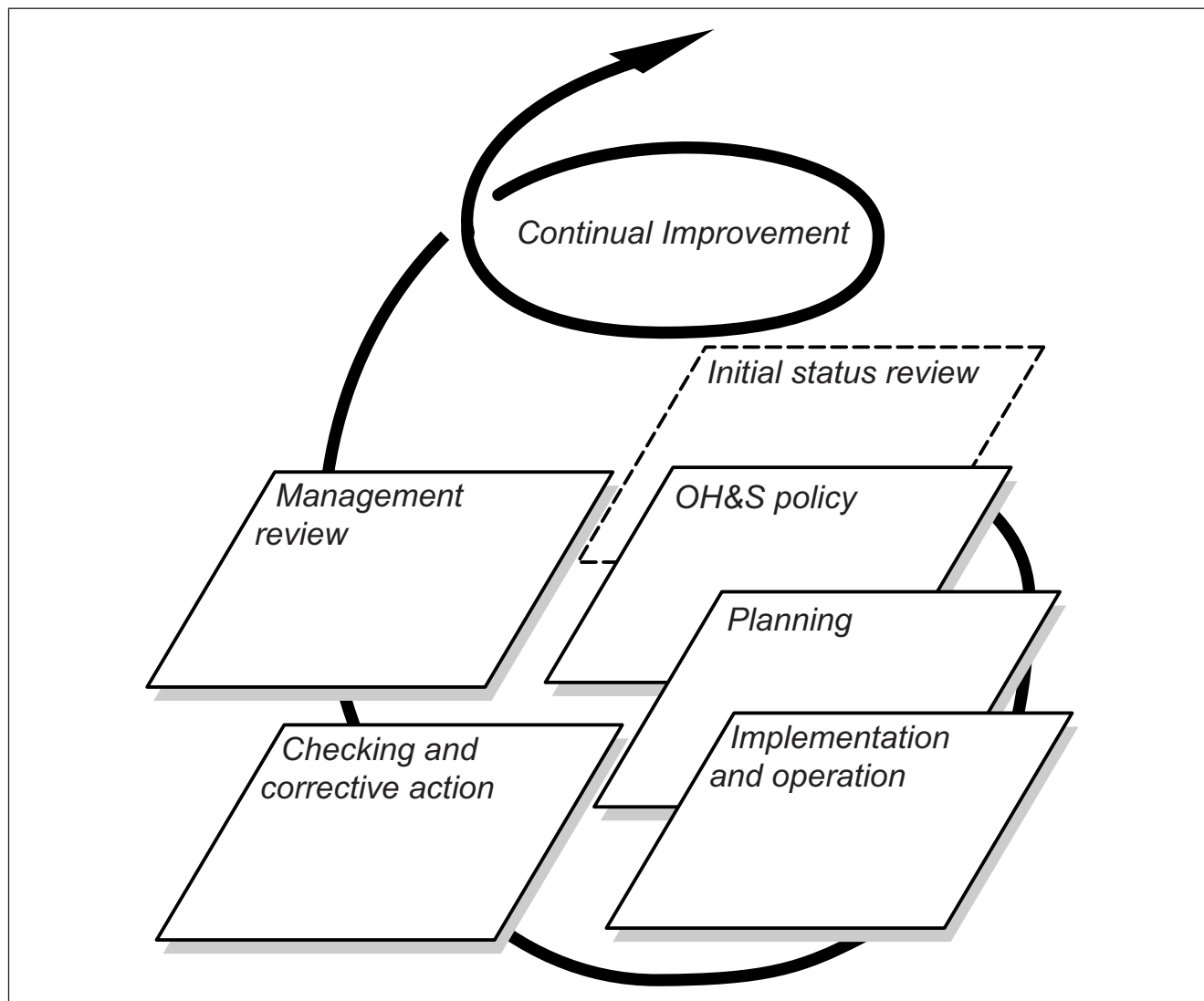
3.34 workplace

any physical location in which work-related activities are performed under the control of the organization

NOTE When giving consideration to what constitutes a workplace, the organization (3.22) should take into account the OH&S effects on personnel who are, for example, travelling or in transit (e.g. driving, flying, on boats or trains), working at the premises of a client or customer, or working at home.

4 OH&S management system

Figure 1 Elements of an OH&S management system



4.1 General

4.1.1 Introduction

Within some organizations elements of the OH&S management system may already be in place, such as the policy and risk assessment records, but others will probably need to be developed further. Some organizations will have an integrated system in place which includes elements that have common requirements to those identified in this standard.

The organization should establish, document, implement, maintain and continually improve an OH&S management system in accordance with this guidance.

“Establish” implies a level of permanency and the system should not be considered established until all its elements have been

demonstrably implemented. “Maintain” implies that, once established, the system continues to operate effectively. This requires active effort on the part of the organization. Many systems start well but deteriorate due to lack of maintenance. Many of the elements of this guidance (such as checking and performance review) are designed to ensure active maintenance of the system.

It is important that all the elements in this guide are incorporated into the OH&S management system, but the manner and extent to which individual elements should be applied will depend on factors such as the size of the organization, the nature of its activities, and the hazards, the risks and the conditions in which it operates. Whilst there are various methods of developing the elements it is recommended that the guidance in Annexes B, C, D, E, F, G, H, I, J, K and L is followed.

An organization with no existing OH&S management system should determine its current position with regard to its OH&S risks by means of an initial status review (see 4.1.2).

4.1.2 Initial status review

An initial status review should be carried out if the organization does not have an established and effective OH&S management system. The initial status review should provide information on the scope, adequacy and implementation of the current management system. Where no formal management system exists, or if the organization is newly established, the initial status review should serve as a basis for establishing what arrangements should be made to ensure an effective OH&S management system is implemented. The initial status review should indicate where the organization currently stands in relation to managing risks.

The review should be carried out by competent persons in consultation with the workers or their representatives. The review should establish to what extent existing arrangements are in place for:

- 1) identifying and anticipating hazards, and assessing risks to health and safety arising from the work environment and work activities (see 4.3.2);
- 2) ensuring the health and safety of those involved in, or affected by, work activities (see 4.3.2);
- 3) developing and implementing effective risk controls to eliminate hazards and minimize risk to health or safety (see 4.3.2);
- 4) identifying and implementing best practice and performance in the organization’s employment sector and other appropriate sectors (e.g. from relevant HSC industry advisory committees and trade association guidelines);
- 5) identifying and responding to the requirements of relevant legal and other requirements dealing with OH&S issues (see 4.3.3);

NOTE The focus of this exercise should be to identify legal and other requirements that apply to the organization’s:

- *industry sector;*
- *activities;*
- *products, processes, facilities, equipment, materials and personnel; and*
- *location.*

- 6) obtaining or developing guidance on OH&S management and making it available throughout the organization (see 4.4.4);
- 7) consultation within and disseminating information throughout the organization (see 4.4.4);
- 8) measuring and evaluating OH&S management performance (see 4.5), including the reporting and investigation of incidents; and
- 9) establishing effective arrangements for the audit and review of the OH&S management system (see 4.5.5 and 4.6).

The review should also examine existing OH&S management practices, processes and procedures and evaluate data from previous incidents, work-related ill health and emergencies.

The results of the initial status review should:

- be documented;
- become the basis for developing and implementing the OH&S management system;
- provide a baseline from which continual improvement can be measured.

An effective approach to the initial status review is to consider each element of the existing or proposed management system against the guidelines for each element of the process described in this standard. Checklists, interviews, direct inspection and measurement techniques might be of use in this process. Where hazard identification and risk assessment processes already exist, they should be reviewed for adequacy against the guidance in 4.3.2.

NOTE The annexes provide information to ensure coverage of key activities.

4.1.3 Scope of the OH&S management system

The scope should be defined and documented so that it is clear and takes account of the definition of “workplace” (see 3.34) and “OH&S” (see 3.17).

An organization can choose to implement an OH&S management system with respect to the entire organization, or to a subdivision of the organization, provided this is consistent with its definition of its workplace. However, once the workplace is defined, all the work-related activities and services of the organization, or subdivision, within that workplace need to be included in the OH&S management system.

Care should be taken in defining and documenting the scope of the OH&S management system, to determine who, what and where, are to be covered. The scope should not be limited so as to exclude an operation or activity that can impact on the OH&S of an organization's employees and other persons under its control in the workplace.

4.2 OH&S policy

An effective OH&S policy should demonstrate the organization's commitment to OH&S. It establishes an overall sense of direction and should guide the setting of objectives against which all subsequent actions will be evaluated. It should contribute to all aspects of business

performance as part of a demonstrable commitment to continual improvement and the development of human factors, including the culture, attitude and beliefs within the organization.

Top management should demonstrate the leadership (see Annex C) and commitment necessary for the OH&S management system to be successful and to achieve improved OH&S performance. The ongoing, proactive involvement of top management in developing and implementing an OH&S policy is crucial.

BS OHSAS 18001:2007 requires that top management define and authorize the organization's OH&S policy and ensure that, within the defined scope of its OH&S management system, it:

- a) is appropriate to the nature and scale of the organization's OH&S risks;
- b) includes a commitment to prevention of injury and ill health and continual improvement in OH&S management and OH&S performance;
- c) includes a commitment to at least comply with applicable legal requirements and with other requirements to which the organization subscribes that relate to its OH&S hazards;
- d) provides the framework for setting and reviewing OH&S objectives;
- e) is documented, implemented and maintained;
- f) is communicated to all persons working under the control of the organization with the intent that they are made aware of their individual OH&S obligations;
- g) is available to interested parties; and
- h) is reviewed periodically to ensure that it remains relevant and appropriate to the organization.

In order to be appropriate, the OH&S policy should:

- be consistent with a vision of the organization's future, and
- be realistic, neither overstating the nature of the risks the organization faces, nor trivializing them.

In developing its OH&S policy, an organization should consider:

- its mission, vision, core values and beliefs;
- coordination with other (corporate or integrated, etc.) policies;
- the needs of persons working under the control of the organization;
- the OH&S hazards of the organization;
- historical and current OH&S performance by the organization;
- opportunities and needs for continual improvement and the prevention of injury and ill health;
- the views of interested parties; and
- what is needed to establish realistic and achievable objectives.

In addition, care should be taken to ensure that the policy includes a commitment to protecting the safety and health of persons at work and others who might be affected by their work activities. Good practice indicates that the above can be achieved by:

- i) top management committing itself to its declared aim and stated policy of protecting people with respect to OH&S;
- ii) recognizing and implementing OH&S as an integral part of improving business performance;
- iii) achieving a high level of OH&S performance, and a commitment to continual cost-effective improvement in performance;
- iv) controlling risk and the prevention of injury, ill health, diseases and incidents;
- v) acknowledging that people are the key resource and promoting the general health and safety of workers;
- vi) providing adequate and appropriate resources and supervision to implement the policy, including access to competent specialist advice where necessary;
- vii) publishing OH&S objectives as a minimum by internal notification;
- viii) placing management of OH&S as a prime responsibility of line management from most senior executive to first-line supervisory level;
- ix) visible participation of top and line management in ensuring good practices are in operation on a day-to-day basis;
- x) ensuring its understanding, implementation and maintenance at all levels in the organization;
- xi) ensuring worker involvement, participation and consultation to gain commitment to the policy and its implementation;
- xii) ensuring that workers at all levels receive appropriate training and are competent to carry out their duties and responsibilities;
- xiii) periodically reviewing the policy, the management system and audit of compliance to policy, as a driver of continual improvement;
- xiv) considering bench marking performance, either internally or with related external organizations; and
- xv) periodically reporting OH&S management performance internally and to external parties where relevant.

The organization's OH&S policy should be set out in a succinct policy statement that captures appropriately the key issues set out in the above lists. This policy statement should be signed and dated by the top manager with responsibility for OH&S. Depending on the type of organization and risks associated with the organization's operations, the policy statement might need to be supplemented in more detail.

The OH&S policy should be consistent with the organization's other management policies, e.g. quality or environmental.

The OH&S policy and policy statement should be reviewed, revalidated and, where necessary, revised by top management as often as necessary to ensure that it remains relevant and appropriate to the organization. It should be communicated and made readily accessible to all persons at their place of work and made available to relevant interested parties, as appropriate (see 4.4.4.2). If changes are introduced, these should be communicated as soon as is practicable.

In communicating the policy, consideration should be given as to how to create and maintain awareness in both new and existing persons

under the control of the organization. The policy can be communicated in alternative forms to the policy statement itself, such as through the use of rules, directives and procedures, wallet cards, posters, etc. In communicating the policy, account should be taken of issues such as diversity in the workplace, literacy levels, language skills, etc.

4.3 Planning

4.3.1 General

Planning is an integral part of all elements of an OH&S management system. An effective OH&S management system should be planned to:

- a) control risks;
- b) react to changing demands; and
- c) sustain a positive health and safety culture (see Annex C).

Effective planning is concerned with prevention through identifying, eliminating and controlling hazards and risks. This is equally important when dealing with health risks, which might only become apparent after a long latency period. Planning should be a collaborative effort involving individuals throughout the organization. This is a good way of demonstrating and gaining commitment to continual improvement and promoting a positive health and safety culture.

NOTE Annex C offers practical guidance on how to develop an OH&S management system in a way that promotes a positive safety culture. It also offers guidance on how to measure and improve the safety culture of an organization.

The planning process should address the following key areas:

- hazard identification, risk assessment and determining controls (see 4.3.2);
- legal and other requirements (see 4.3.3); and
- objectives and programme(s) (see 4.3.4).

Annex D provides guidance on a planning process that could be used to develop any aspect of the OH&S management system.

4.3.2 Hazard identification, risk assessment and determining controls

It is essential that there is a comprehensive appreciation of the significant OH&S hazards and risks associated with the organization's undertakings. An organization will need to apply the process of hazard identification (see 3.9) and risk assessment (see 3.27) to determine the controls that are necessary to reduce the risks of injury and ill health. The overall purpose of the risk assessment process is to understand the hazards (see 3.8) that exist or might arise in the course of the organization's activities, and ensure that the risks (see 3.26) to people arising from these hazards are assessed, prioritized and controlled to eliminate hazards or reduce risks to acceptable levels (see 3.1).

This is achieved by:

- developing a methodology for hazard identification and risk assessment;
- identifying hazards;

- estimating the associated risks, taking into account the adequacy of any existing controls (it might be necessary to obtain additional data and perform further analysis in order to achieve a reasonable estimation of the risks);
- determining whether these risks are acceptable (see 3.1); and
- determining the appropriate and effective risk controls to reduce risks where these are found to be necessary.

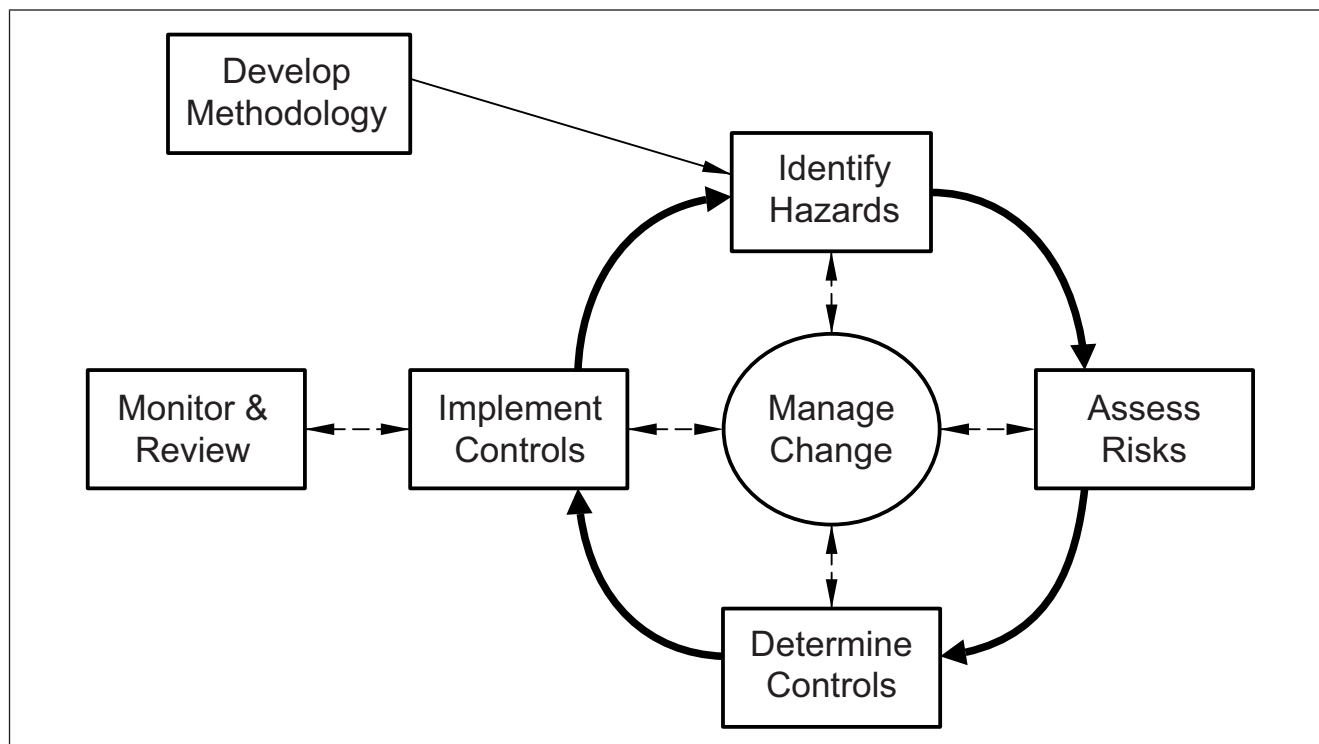
Annex E provides guidance on the principles and practicalities of OH&S hazard identification, risk assessment and risk control.

The results of risk assessments enable the organization to compare risk reduction options and prioritize actions and associated resources for effective risk management.

The outputs from the hazard identification, risk assessment and determining control processes should also be used throughout the development and implementation of the OH&S management system.

Figure 2 provides an overview of the risk assessment process.

Figure 2 Overview of the risk assessment process



NOTE The development of the methodology can itself be subject to change or improvement.

Hazards have the potential to cause human injury or ill health. Hazards therefore need to be identified before the risks associated with these hazards can be assessed and, if no controls exist or existing controls are inadequate, effective controls should be implemented according to the hierarchy of controls.

In high hazard industries, organizations need to ensure that proper attention is given to the high consequence, low probability type event to ensure that adequate control is achieved.

The procedure(s) for hazard identification and risk assessment should take into account:

- a) routine and non-routine activities (see Annex E);
- b) activities of all persons having access to the workplace (including contractors and visitors);
- c) human behaviour, capabilities and other human factors;
- d) identified hazards originating outside the workplace capable of adversely affecting the health and safety of persons under the control of the organization within the workplace;
- e) hazards created in the vicinity of the workplace by work-related activities under the control of the organization;
- f) infrastructure, equipment and materials at the workplace, whether provided by the organization or others;
- g) changes or proposed changes in the organization, its activities, or materials;
- h) modifications to the OH&S management system, including temporary changes, and their impacts on operations, processes, and activities;
- i) any applicable legal obligations relating to risk assessment and implementation of necessary controls (see also the Note to 3.17); and
- j) the design of work areas, processes, installations, machinery/equipment, operating procedures and work organization, including their adaptation to human capabilities.

The organization's methodology for hazard identification and risk assessment should:

- a) be defined with respect to its scope, nature and timing to ensure it is proactive rather than reactive; and
- b) provide for the identification, prioritization and documentation of risks, and the application of controls, as appropriate.

For the management of change, the organization should identify the OH&S hazards and OH&S risks associated with changes in the organization, the OH&S management system, or its activities, prior to the introduction of such changes.

Depending on the nature of the change and circumstances the risk assessment could vary in depth and detail. Temporary measures might need to be taken in certain circumstances but should always be confirmed by a full risk assessment. Such changes should always be covered by the management of change procedure.

When determining controls, or considering changes to existing controls, consideration should be given to reducing the risks according to the following hierarchy:

- a) elimination;
- b) substitution;
- c) engineering controls;
- d) signage/warnings and/or administrative controls; and
- e) personal protective equipment.

The organization should document and keep up-to-date the results of identification of hazards, risk assessments and determined controls.

The organization should ensure that the OH&S risks and determined controls are taken into account when establishing, implementing and maintaining its OH&S management system.

Risk controls and risk control systems are more effective when they are properly designed to take into account the strengths and weaknesses of human behaviour, attitudes to risk and existing business practice.

4.3.3 Legal and other requirements

The organization should establish, implement and maintain a procedure(s) for identifying and accessing current and emerging legal and other OH&S requirements and guidance that are applicable to its activities and services.

The organization should ensure that these applicable legal requirements and other requirements to which the organization subscribes are taken into account in establishing, implementing and maintaining its OH&S management system.

The organization should keep this information up-to-date.

The organization should communicate relevant information on legal and other requirements to persons working under its control, and to other relevant interested parties. Relevant workers within the organization should be aware of and understand these requirements, which vary from locality/country to locality/country.

Legal requirements can take many forms, such as:

- legislation, including statutes, regulations and codes of practice;
- decrees and directives;
- orders issued by regulators;
- permits, licences or other forms of authorization;
- judgements of courts or administrative tribunals; and
- treaties, conventions or protocols.

Depending on its circumstances and needs, an organization may subscribe voluntarily to requirements, other than legal requirements, that relate to its OH&S hazards. Such other OH&S requirements, can include:

- contractual conditions;
- agreements with workers;
- agreements with interested parties;
- agreements with health authorities;
- non-regulatory guidelines;
- voluntary principles, best practices or codes of practice;
- public commitments of the organization or its parent organization; and
- corporate/company requirements.

Depending on the nature of its OH&S hazards, operations, equipment, materials, etc., an organization should seek out relevant applicable

OH&S legislative or other requirements. This might be achieved through the use of knowledge within the organization and/or through the use of external sources such as:

- the internet;
- libraries;
- trade associations;
- regulators;
- legal services;
- OH&S institutes;
- OH&S consultants;
- equipment manufacturers;
- materials suppliers;
- contractors;
- customers.

Having identified what is applicable, the organization's procedure needs to include information on how it can access the legal and other requirements. There is no requirement to maintain a library; it is sufficient that the organization is able to access the information when needed.

The organization's procedure should ensure that it can identify any changes that affect the applicability of legal and other requirements relevant to its OH&S hazards.

The organization's procedure needs to identify who should receive information on legal and other requirements, and ensure that relevant information is communicated to them (see 4.4.4).

4.3.4 Objectives and programme(s)

4.3.4.1 General

In the planning process, an organization sets objectives to fulfil the commitments established in its OH&S policy.

The process of setting and reviewing objectives and implementing programmes to achieve them provides a mechanism for the organization to improve OH&S performance or to improve the OH&S management system.

4.3.4.2 Objectives

The organization should establish, implement and maintain documented OH&S objectives, at relevant functions and levels within the organization.

The organization should set objectives to fulfil the commitments established in its OH&S policy, including its commitments to the prevention of injury and ill health. Setting objectives is an integral part of the planning of an OH&S management system.

The objectives should be measurable, where practicable, and consistent with the OH&S policy.

When establishing and reviewing its objectives, an organization should take into account the legal requirements and other

requirements to which the organization subscribes, and its OH&S risks. It should also consider its technological options, its financial, operational and business requirements, and the views of relevant interested parties.

The process of setting and reviewing objectives, and implementing programmes to achieve them, provides a mechanism for the organization to continually improve its OH&S management system and to improve its OH&S performance.

The organization should make use of the other information obtained from the planning process (e.g. a prioritized list of OH&S risks) to determine whether it needs to set specific objectives in relation to any of its legal and other requirements, or its OH&S risks. However, the organization is not required to establish OH&S objectives for each legal and other requirement or OH&S risk identified.

Examples of types of OH&S objectives include:

- reduction of risk levels;
- the introduction of additional features into the OH&S management system;
- the steps taken to improve existing features, or the consistency of their application; and
- the elimination, or the reduction in frequency, of particular undesired incident(s).

The key elements to planning and setting the objectives are as follows.

- a) The organization's objectives should be clearly defined and prioritized.
- b) Objectives should be specific to the organization and appropriate to its size, the nature of its activities, and the hazards, risks and the conditions in which it operates.
- c) Suitable, specific and transparent performance indicators should be chosen to measure if objectives have been or are being achieved. These indicators should be defined before moving to the next stage.
- d) Adequate financial, human resources and technical support should be made available.

NOTE 1 Sometimes the acronym "SMART" is applied to the establishment of objectives, i.e. that they should be specific, measurable, achievable, realistic, time-oriented.

Selecting and prioritizing objectives is most effectively achieved by involving the workers in the decision making process.

Issues that the organization may wish to take into consideration when setting objectives include:

- policy and objectives relevant to the organization's business as a whole;
- results of hazard identification and risk assessment;
- legal and other requirements;
- technological options and financial and operational requirements;
- evaluations of the effectiveness of the OH&S management system (e.g. from internal audits);

- views of workers (e.g. from attitude surveys);
- information from worker OH&S consultations, reviews and improvement activities in the workplace (these activities can be either reactive or proactive in nature);
- analysis of performance against previously established OH&S objectives;
- past records of OH&S nonconformities and incidents;
- information or data from clients, contractors or other interested parties;
- the results of the management review (see 4.6.2); and
- the need for and availability of resources.

During the establishment of OH&S objectives, particular regard should be given to information or data from those people most likely to be affected by individual OH&S objectives, as this can assist in ensuring that the objectives are reasonable and more widely accepted.

The OH&S objectives should address both broad corporate OH&S issues and OH&S issues that are specific to individual functions and levels within the organization.

OH&S objectives can be broken down into tasks, depending on their complexity and timescales, and the size of the organization. There should be clear links between the various levels of tasks and the OH&S objectives.

Overall OH&S objectives should be endorsed by top management. Specific OH&S objectives and tasks may be established by other functions as appropriate.

Not all functions and departments will need specific OH&S objectives.

NOTE 2 The organization should guard against setting too many overall objectives; it is preferable for it to focus on a limited set of key objectives. There should be links between the overall objectives and the specific objectives.

NOTE 3 Objectives are sometimes given associated "targets". For the purpose of the OHSAS standards "targets" are viewed as being a sub-set of objectives.

4.3.4.3 Programme(s)

In order to achieve the objectives a programme(s) should be established. A programme is an action plan for achieving all the OH&S objectives, or individual OH&S objectives.

The organization should establish, implement and maintain a programme(s) for achieving its objectives. The programme(s) should include as a minimum:

- a) designation of responsibility and authority for achieving objectives at relevant functions and levels of the organization; and
- b) the means and time-frame by which the objectives are to be achieved.

In considering the means necessary to establish the programme(s) the organization should examine the resources required (financial, human and infrastructure) and the tasks to be performed. Depending on

the complexity of the programme established to achieve a particular objective, the organization should assign responsibility, authority, and completion dates for individual tasks, to ensure that the OH&S objective can be accomplished within the overall timeframe.

The OH&S objectives and programme(s) should be communicated (e.g. via training and/or group briefing sessions) to relevant personnel.

The programme(s) should be reviewed at regular and planned intervals, and adjusted as necessary, to ensure that the objectives are achieved.

4.3.4.4 Management arrangements

The design of management arrangements should reflect the organization's business needs and the nature of their risks. However, there should be appropriate activity across all five elements of the model (policy, planning, implementing, operating and reviewing).

Specifically, the organization should make arrangements to cover the following key areas:

- a) overall plans and objectives, including workers and resources, for the organization to implement its policy;
- b) operational plans to implement arrangements to control the risks identified in 4.3.2 and to meet the recommendations of 4.3.3;
- c) contingency plans to mitigate or avoid the effects of foreseeable emergencies (e.g. prevention, preparedness and response procedures);
- d) planning for organizational activities (see 4.3.4);
- e) plans covering the management of change of either a permanent or temporary nature (e.g. change associated with new processes or plant, working procedures, production fluctuations, legal requirements, and organizational and staffing changes);
- f) plans covering interactions with other interested parties (e.g. control, selection and management of contractors, liaison with emergency services and visitor control);
- g) planning for measuring performance, audits and status reviews (see 4.5 and 4.6);
- h) implementing corrective actions; and
- i) plans for assisting recovery and return to work of any worker who is injured or ill through their work activities.

Where fundamental changes cannot be made prioritized action plans should be drawn up and implemented. In the interim properly assessed short-term measures should be taken to control the risk.

4.4 Implementation and operation

4.4.1 General

Responsibilities, relationships and good practices of OH&S that promote a positive health and safety culture and secure the implementation and continued development of the OH&S policy should be defined.

The management structure and the processes used within the organization should:

- a) establish and maintain control of the OH&S arrangements;
- b) promote cooperation between individuals, worker representatives and groups so that health and safety is a collaborative effort;
- c) ensure the communication of relevant information throughout the organization;
- d) secure the competence of workers and the selection of competent contractors;
- e) provide clear and visible leadership on OH&S (see Annex C); and
- f) ensure continual improvement.

4.4.2 Resources, roles, responsibility, accountability and authority

4.4.2.1 Management responsibilities

Top management (the board of directors or executive management or equivalent) should take ultimate responsibility for OH&S and the OH&S management system and demonstrate its commitment by:

- a) ensuring the availability of resources essential to establish, implement, maintain and improve the OH&S management system;

NOTE Resources include human resources and specialized skills, organizational infrastructure, technology and financial resources.

- b) defining roles, allocating responsibilities and accountabilities, and delegating authorities, to facilitate effective OH&S management; roles, responsibilities, accountabilities, and authorities should be documented and communicated;

NOTE "Accountability" means "ultimate responsibility", and relates to the person who is held to account if something is not done, does not work or fails to achieve its objective.

- c) ensuring that those with responsibilities for OH&S management have the necessary authority to fulfil their role; and
- d) being actively involved in the continual improvement of OH&S performance.

When determining the resources needed to establish, implement and maintain the OH&S management system, the organization should consider:

- the financial, human and other resources specific to its operations;
- the technologies specific to its operations;
- infrastructure and equipment;
- information systems; and
- the need for expertise and training.

Resources and their allocation should be reviewed periodically and in conjunction with the management review to ensure they are sufficient to carry out OH&S programmes and activities, including performance measurement and monitoring. In evaluating the

adequacy of resources, consideration should also be given to planned changes and/or new projects or operations.

There should be clarity of responsibilities at the interfaces between different functions (e.g. between departments, between different levels of management, between workers, between the organization and contractors, and between the organization and its neighbours).

The organization should appoint a member(s) of top management with specific responsibility for OH&S, irrespective of other responsibilities, and with defined roles and authority for:

- a) ensuring that the OH&S management system is established, implemented and maintained in accordance with this guidance and is performing to expectations in all locations and spheres of operation within the organization (see Annex C);
- b) ensuring that reports on the performance of the OH&S management system are presented to top management for review and used as a basis for improvement of the OH&S management system;
- c) ensuring that where necessary one or more competent persons are appointed to help undertake the measures needed;
- d) the achievement of all OH&S objectives; and
- e) the management review (see 4.6.2) and evaluation of the OH&S management system.

The existence of a top management appointee (e.g. in a large organization, a Board or executive committee member) does not absolve other top managers of their collective and individual responsibility. This appointee may delegate some of their duties to a subordinate management representative(s) while still retaining accountability. However, the management appointee should be regularly informed of the performance of the system, and should retain active involvement in periodic reviews and the setting of OH&S objectives. It should be ensured that any other duties or functions assigned to the top management appointee do not conflict with the fulfilment of their OH&S responsibilities.

The identity of the top management appointee should be made available to all persons working under the control of the organization.

Management at all levels have responsibility for ensuring that OH&S is managed effectively within their areas of control. The role and responsibilities of any specialist OH&S function within the organization should be appropriately defined to avoid ambiguity. This should include arrangements to resolve any conflict between OH&S issues and operational considerations and, where appropriate, escalation to a higher level of management.

Top management should determine the level of supervision for staff at all levels necessary for tasks to be carried out safely.

All managers should clearly demonstrate their commitment to OH&S by, for example:

- attending and actively participating at OH&S meetings;
- visiting and inspecting sites;
- participating in risk assessment and risk control processes;
- participating in incident investigation;

- committing resources to preventive and corrective actions; and
- issuing messages of support.

The organization should communicate and promote OH&S as the responsibility of everyone in the organization, not just those with defined OH&S management system duties.

4.4.2.2 General responsibilities

In addition to any allocated responsibilities, all workers should be made aware that they have a general responsibility for their own and others' health and safety.

The organization should establish, implement and maintain a procedure(s) to ensure that persons working under its control are aware of:

- a) their responsibility for the health and safety at work of themselves, those they manage, and others with whom they work;
- b) their responsibility for the health and safety of people who might be affected by the activities they manage, e.g. contractors and public;
- c) their roles and responsibilities and importance in achieving conformity to the OH&S policy and procedures and to the requirements of the OH&S management system, including emergency preparedness and response requirements (see 4.4.8);
- d) the OH&S consequences, actual or potential, of their work activities, their behaviour, and the OH&S benefits of improved personal performance; and
- e) the influence that their action or inaction can have on the effectiveness of the OH&S management system and the potential consequences of departure from specified procedures.

All levels of the organization should be fully aware of the relevance and importance of their activities and how they contribute to the achievement of the organization's OH&S objectives.

4.4.2.3 Responsibility allocation

Individual responsibilities for the implementation of OH&S policy should be clearly allocated and communicated to those involved. To achieve this, the following aspects should be addressed.

- a) Individual OH&S responsibilities should be clearly defined and communicated to those involved. Where job descriptions are used they should include such responsibilities.
- b) Responsibilities should be reasonable and all workers should be given the authority and resources (including time) necessary to carry out their responsibilities.
- c) Appropriate arrangements should exist whereby workers are held accountable for discharging their responsibilities.
- d) Reporting relationships should be clear and unambiguous.
- e) Where personal appraisal systems exist, OH&S performance should be included in the appraisal system.

4.4.2.4 Organizational arrangements

It is important that OH&S, in its broadest sense, is fully integrated across the organization and into all its activities, whatever the size or nature of its work (see Annex A). When organizing the implementation of the policy and the effective management of OH&S, the organization should:

- a) have (or have access to) sufficient OH&S knowledge, skills and experience to manage its activities safely and in accordance with legal requirements;
- b) establish effective arrangements to identify and eliminate or control OH&S hazards and risks and promote health at work (see 4.3.2); and
- c) define the allocation of responsibilities and accountabilities in the management structure (see 4.4.2).

4.4.3 Competence, training and awareness

4.4.3.1 General

When organizing the implementation of the OH&S policy and the effective management of OH&S, the organization should allocate adequate resources and supervision commensurate with its size and the nature of its activities, and:

- a) ensure personnel have the necessary competencies to carry out their responsibilities;
- b) identify existing competencies actually required and any gaps between them at all levels within the organization, and provide any necessary training;
- c) ensure persons under its control have the necessary awareness of OH&S issues and are motivated to work or act in a safe manner.

The organization should require that contractors are able to demonstrate that their workers have the requisite competence and/or appropriate training.

NOTE "Awareness" is to be conscious of something, e.g. OH&S risks and hazards. "Competence" is the demonstrated ability to apply knowledge and skills.

4.4.3.2 Competence

The organization should ensure that any person(s) under its control performing tasks that can impact on OH&S is (are) competent on the basis of appropriate education, training or experience, and should retain associated records.

In determining what activities or tasks could impact on OH&S the organization should consider those which:

- the organization's risk assessment has determined create an OH&S risk(s) in the workplace;
- are intended to control OH&S risks;
- are specific to the implementation of the OH&S management system.

The organization should determine the competence requirements for individual tasks and ensure that personnel meet the necessary requirements based on their education, training and/or experience. The organization can seek external advice in defining competence requirements.

OH&S competence requirements should be considered prior to recruiting new personnel, and/or the reassignment of those already working under the control of the organization.

The organization should identify and assess any differences between the competence needed to perform an activity and that possessed by the individual required to perform the activity. These differences may be addressed through training or other actions, e.g. additional education and skills development, but with due regard to the capabilities of the individual.

When determining the competence required for a task, the following factors should be considered:

- roles and responsibilities in the workplace, the nature of the tasks to be performed, and their associated OH&S risks, controls and measures;
- the complexity and requirements of operating procedures and instructions;
- the results from incident investigations;
- legal and other requirements; and
- individual capability (e.g. literacy, language skills, etc.).

The organization should give specific consideration to the competency requirements for those who will be:

- the top management appointee (see 4.4.2.1);
- performing risk assessments (4.3.2) and identifying legal and other requirements;
- performing exposure assessments (4.5.1);
- performing incident investigations (4.5.3.2); and
- performing audits (4.5.5).

The organization should ensure that people are competent prior to permitting them to perform tasks that can impact on OH&S.

NOTE This can include visitors or members of the public using equipment or carrying out activities.

4.4.3.3 Training

The organization should identify training needs associated with its OH&S risks and management system. It should provide training to meet these needs, evaluate the effectiveness of the training, and retain associated records (see 4.4.5).

Training procedures should take into account differing levels of:

- a) responsibility, ability, language skills and literacy; and
- b) risk.

The organization should consider the roles and responsibilities, in relation to its OH&S risks and the OH&S management system, in

determining the training needed for those persons working under its control (including contractors, temporary workers, etc.).

Training should focus on both competency requirements and the need to enhance awareness.

When developing training programmes, the following elements should be considered:

- a) a systematic programme of induction and ongoing training for workers and those who transfer between divisions, sites, departments, areas, jobs or tasks in the organization or are returning to work after a prolonged absence; the training could include the local OH&S arrangements, the hazards, risks, precautions and procedures of work to be undertaken before work commences;
- b) training for all individuals who manage staff, contractors and others, e.g. temporary workers; this could include training in risk assessment and control techniques for designers, maintenance personnel and those responsible for the development of the process or working methods;
- c) training for directors and top managers addressing their roles and responsibilities for ensuring the OH&S management system functions as necessary to control risks and minimize ill health and injury; and
- d) individual capabilities, such as literacy and language skills, for example it might be preferable to use pictures and diagrams or symbols that can be easily understood; training materials might be needed in multiple languages or the use of translators might be necessary.

Contractors, temporary workers and visitors should be included in the training programme according to the level of risks to which they might be exposed or could cause.

The organization should evaluate the effectiveness of the training by, for example, written or oral examination and practical demonstration or observation.

4.4.3.4 Awareness

In addition to ensuring that individuals are competent for their individual roles or activities, the organization should ensure that all persons under its control understand:

- emergency procedures;
- the OH&S consequences, actual or potential, of their work activities, and their behaviour in relation to OH&S risks;
- the benefits of improved OH&S performance;
- the potential consequences of departing from procedures;
- the need to conform to OH&S policies and procedures;
- the influence that their action or inaction can have on the effectiveness of the OH&S management system, and are motivated to work or act in a safe manner.

Awareness training should take account of OH&S risks and individual capabilities, e.g. literacy, language skills and maturity.

Awareness training should be provided for contractors, temporary workers and visitors, etc., according to the level of risk to which they are exposed.

4.4.4 Communication, participation and consultation

4.4.4.1 General

The organization, through the processes of communication and consultation, should encourage participation in good OH&S practices and support for its OH&S policy and OH&S objectives from those affected by its activities or interested in its OH&S management system.

The organization's communication processes should provide for the flow of information upwards, downwards and across the organization. It should provide for both the gathering and the dissemination of information. It should ensure that OH&S information is provided, received and understood by all relevant persons.

Consultation is the process by which management and other persons, or their representatives, jointly consider and discuss issues of mutual concern. It involves seeking acceptable solutions to problems through the general exchange of views and information.

Examples of those who could be interested in or affected by an organization's OH&S management system include employees at all levels of the organization, employee representatives, temporary workers, contractors, visitors, neighbours, volunteers, emergency services (see **4.4.8**), insurers and government or regulatory inspectors.

4.4.4.2 Communication

4.4.4.2.1 Procedure for communication

With regard to its OH&S hazards and OH&S management system, the organization should establish, implement and maintain a procedure(s) for:

- a) internal communication among the various levels and functions of the organization;
- b) communication with contractors and other visitors to the workplace; and
- c) receiving, documenting and responding to relevant communications from external interested parties.

The organization should effectively communicate information concerning its OH&S hazards and management system to those involved in or affected by the management system. These could include all workers, including temporary workers, and their representatives, contractors, visitors, neighbours, volunteers, emergency services (see **4.4.8**), insurers and government or regulatory body inspectors.

When developing procedures for communication, the organization should consider the following:

- the target audience and their information needs;
- appropriate methods and media;
- local culture, preferred styles and available technologies for communication;

- organizational complexity, structure and size;
- barriers to effective communication in the workplace, such as illiteracy or language;
- legal and other requirements;
- the effectiveness of the various modes and flows of communication across all functions and levels of the organization; and
- evaluation of the effectiveness of the communication.

OH&S issues can be communicated by means such as:

- OH&S briefings and meetings, induction/orientation talks, etc.; and
- newsletters, posters, emails, suggestion boxes/schemes, websites, notice boards containing information on OH&S issues.

4.4.4.2.2 Internal communication

It is important to communicate effectively information about OH&S risks and the OH&S management system at various levels and between various functions of the organization.

This should include information relating to:

- a) management's commitment to the OH&S management system (e.g. programmes undertaken and resources committed to improving OH&S performance);
- b) the identification of hazards and risks (e.g. information on process flows, materials in use, equipment specifications and observation of work practices);
- c) OH&S objectives and other continual improvement activities;
- d) incident investigation (e.g. the type of incidents that are taking place, factors that can contribute to the occurrence of incidents and results of incident investigations);
- e) progress in eliminating OH&S hazards and risks (e.g. status reports showing the progress of projects that have been completed or are underway); and
- f) operational changes that might impact on the OH&S management system.

The OH&S policy should be communicated to all persons working under the control of the organization in order to assist them to understand:

- what management is committed to; and
- what they are individually required to do,

by:

- demonstrating the commitment of top management and the organization to OH&S;
- increasing awareness of the commitments made in the policy statement;
- explaining why the OH&S system is established and maintained; and
- guiding individuals in understanding their OH&S accountabilities and responsibilities (see 4.4.2).

4.4.4.2.3 Communication with contractors and other visitors

It is important to develop and maintain procedures for communicating with contractors and other visitors to the workplace. The extent of this communication should be related to the OH&S risks faced by these parties.

The organization should have arrangements in place to clearly communicate its OH&S requirements to contractors. The procedure(s) should be appropriate to the OH&S hazards and risks associated with the work to be performed. In addition to communicating performance requirements, the organization should communicate the consequences associated with nonconformity with OH&S requirements.

Contracts are often used to communicate OH&S performance requirements. Contracts might need to be supplemented with other on-site arrangements (e.g. pre-project OH&S planning meetings) to ensure that appropriate controls are implemented to protect individuals at the workplace.

The communication should include information about any operational controls (see 4.4.7) related to the specific tasks to be performed or the area where the work is to be done. This information should be communicated before the contractor comes on site and then supplemented with additional or other information (e.g. a site tour), as appropriate, when the work starts. The organization should also have procedures in place for consultation with contractors when there are changes that affect their OH&S (see 4.4.4.2.4).

In addition to the specific OH&S requirements for activities carried out on site the following could also be relevant to the organization when developing its procedure(s) for communications with contractors:

- information about a contractor's OH&S management system (e.g. established policies and procedures to address pertinent OH&S hazards);
- legal and other requirements that impact on the method or extent of communication;
- previous OH&S experience (e.g. OH&S performance data);
- the existence of multiple contractors at the worksite;
- staffing for accomplishing OH&S activities (e.g. exposure monitoring and equipment inspections);
- emergency response;
- the need for alignment of contractors' OH&S policies and practices with those of the organization and other contractors at the worksite;
- the need for additional consultation and/or contractual provisions for high-risk tasks;
- requirements for the assessment of conformity with agreed OH&S performance criteria;
- processes for incident investigation, reporting of nonconformities and corrective action; and
- arrangements for day-to-day communications.

For visitors (including delivery people, customers, members of the public, service providers, etc.), communication can include warning

signs and security barriers, as well as verbal or written communication. Information that should be communicated includes:

- OH&S requirements relevant to their visit;
- evacuation procedures and responses to alarms;
- traffic controls;
- access controls and escort requirements; and
- any personal protective equipment (PPE) that needs to be worn (e.g. safety glasses).

4.4.4.2.4 Communication with external interested parties

The organization needs to have a procedure(s) in place for receiving, documenting and responding to relevant communications from external interested parties.

The organization should provide appropriate and consistent information about its OH&S hazards and management system in accordance with its OH&S policy and other requirements. This can include information concerning its normal operations or potential emergency situations.

NOTE There might also be legal requirements to provide information about OH&S hazards and the management system.

External communication procedures often include the identification of designated contact individuals. This allows for appropriate information to be communicated in a consistent manner. This can be especially important in emergency situations where regular updates are requested and a wide range of questions need to be answered (see 4.4.8).

4.4.4.3 Procedure for worker participation

The organization should establish, implement and maintain a procedure(s) for:

- a) the participation of workers by their appropriate involvement in:
 - hazard identification, risk assessments and determination of controls;
 - incident investigation;
 - the development and review of OH&S policies and objectives; and
 - the development of new or improved OH&S arrangements and procedures;
- b) consultation with workers on OH&S matters, including:
 - changes that affect their OH&S (e.g. the introduction of new or modified equipment, new chemicals or materials, new processes, procedures or work patterns);
 - the selection of appropriate controls, including discussion of alternative options for controlling specific hazards and their beneficial or adverse outcomes.

The organization's procedure(s) should address the need for the active and ongoing participation of workers in the development and review of OH&S practices and, where appropriate, the development of the

OH&S management system. The participation arrangements should take account of any legal and other requirements.

Workers should be informed about the arrangements that have been made for their participation and the individual who represents them on OH&S matters. OH&S representatives should have defined roles.

In addition, the organization's procedure(s) for the involvement of workers could include:

- consultation in the selection of appropriate controls, including discussion of the benefits or adverse outcomes of alternative options for controlling specific hazards or preventing unsafe behaviour;
- involvement in recommending improvements to OH&S performance;
- consultation concerning changes that affect OH&S, particularly before the introduction of new or unfamiliar hazards, e.g.:
 - the introduction of new or modified equipment;
 - the construction, modification or change of use of buildings and facilities;
 - the use of new chemicals or materials;
 - reorganization, new processes, procedures or work patterns.

In developing its procedure(s) for worker participation, the organization should consider potential incentives and barriers to participation (e.g. language and literacy issues, the fear of reprisal), confidentiality and privacy issues (See Annex H).

The organization should make arrangements for workers and their safety and health representatives to have the time and resources, including any necessary training and information, to participate actively in the processes of organizing, planning and implementation, evaluation and action for improvement of the OSH management system, as recommended by the ILO-OSH:2001 guidelines.

4.4.4.4 Procedures for consultation with contractors and external interested parties

The organization should have a procedure(s) for consulting with contractors and other relevant external interested parties, where appropriate.

In considering the need for consultation with contractors on changes that might affect their OH&S, the organization should take account of the following:

- new or unfamiliar hazards (including those that might be introduced by the contractor);
- reorganization;
- new or amended controls;
- changes in materials, equipment, exposures, etc.;
- changes in emergency arrangements; and
- changes in legal or other requirements.

The organization might need to consult with and provide information to external interested parties (see Note to 3.15) concerning certain OH&S matters (see 4.4.8).

For consultation with external parties, the organization should give consideration to factors such as:

- changes in emergency arrangements;
- hazards that can impact neighbours, or hazards from neighbours; and
- changes in legal or other requirements.

4.4.5 Documentation

The organization should produce and maintain up-to-date documentation that is sufficient to ensure that its OH&S management system is effective. It is also important in assembling and retaining OH&S knowledge.

The organization should review its documentation and information needs for the OH&S management system before developing the documentation necessary to support its OH&S processes.

In determining the extent of documentation required the general principle that applies is that if there is any risk that a task, through lack of a written procedures or instructions, will not be performed in the required manner then a written procedure is required.

It is important that documentation is:

- a) tailored to the organization's needs, taking into account statutory requirements;
- b) proportional to the level of complexity, hazards and risks concerned; and
- c) kept to the minimum required for effectiveness and efficiency.

The OH&S management system documentation should include:

- a) the OH&S policy, OH&S policy statement and objectives;
- b) description of the scope of the OH&S management system;
- c) description of the main elements of the OH&S management system and their interaction, and reference to related documents;
- d) documents, including records, identified by this guidance;
- e) documents, including records, determined by the organization to be necessary to ensure the effective planning, operation and control of processes that relate to the management of its OH&S risks;
- f) organization statements showing health and safety roles and responsibilities (see 4.4.2);
- g) performance requirements and measures;
- h) supporting organizational and risk control information and procedures;
- i) appropriate findings from initial status reviews (see 4.1.2), risk assessments investigations (see 4.3.2 and 4.5.3), audits (see 4.5.5) and periodic status reviews (see 4.6.3).

The responsibilities and authority of all persons who perform duties that are part of the OH&S management system should be documented. These can make use of:

- OH&S management system procedures;
- operational procedures or work station procedures;
- task descriptions;
- job descriptions; and
- induction training packages.

However, the organization is free to choose whatever format best suits its needs.

Such documentation can, among others, be required for the following people:

- top management;
- the top management appointee for OH&S;
- line management at all levels in the organization;
- process operators and the workers generally;
- those managing the OH&S of contractors;
- those responsible for OH&S training;
- those responsible for equipment that is critical for OH&S;
- workers with OH&S qualifications, or other OH&S specialists, within the organization; and
- worker OH&S representatives on participative/consultative forums.

The organization should make arrangements to ensure that OH&S documentation is:

- applicable to the purpose for which it is intended, taking into account requirements of data protection legislation; and
- available to enable OH&S plans to be fully implemented and is proportional to their needs.

Records are a particular type of document. Whereas the above documents specify how safe conditions are to be achieved, records contain the history of actual events and contain the evidence that safe conditions were achieved at a particular time. Records can include specific safety plans, the results of measurement surveys and health surveillance data.

4.4.6 Control of documents

All documents and data containing information required for the operation of the OH&S management system and the performance of the organization's OH&S activities should be identified and controlled.

The organization should establish, implement and maintain a procedure(s) to:

- a) approve documents for adequacy prior to issue;
- b) review, update as necessary and re-approve documents;
- c) ensure that changes and the current revision status of documents are identified;

- d) ensure that relevant versions of applicable documents are available at points of use;
- e) ensure that documents remain legible and readily identifiable;
- f) ensure that documents of external origin determined by the organization to be necessary for the planning and operation of the OH&S management system are identified and their distribution controlled; and
- g) prevent the unintended use of obsolete documents and apply suitable identification to them if they are retained for any purpose.

The procedure(s) should define the controls for the identification, approval, issue and removal of OH&S documentation, together with the control of OH&S data in accordance with items a) to g). The procedure(s) should clearly define the categories of documentation and data to which they apply.

Documents and data should be available and accessible when required, under routine and non-routine conditions, including emergencies. This should include ensuring that up-to-date plant engineering drawings, hazardous material data sheets, procedures, instructions, etc., are available to those persons who require them in an emergency.

The organization should establish procedures for identifying any documents of external origin required for planning and implementing its OH&S management system. External reference documentation includes legislation, codes of practice, guidelines, specifications, and technical safety information, such as toxicological information. The organization should ensure that it has formalized procedures for ensuring that it maintains these documents up-to-date. Responsibility for this task should be assigned. The person(s) charged with this task should ensure that all persons in the organization are kept informed of any relevant changes to such information that affects their duties or working conditions.

Documents should be reviewed periodically to ensure that they are still valid and accurate. This can be done as part of an internal audit or as a separate dedicated exercise. It can also be done:

- as part of a review of risk assessment of processes;
- as part of a response to an incident;
- as part of the management of change procedure; and
- following changes in legal and other requirements, processes, installation, workplace layout, etc.

Obsolete documents retained for reference can present a particular concern, and great care should be taken to ensure that they do not return back into circulation. However, it is sometimes necessary to retain obsolete documents as part of the records relating to the development or performance of the OH&S management system.

Typical controls include the following:

- document control procedure, including assigned responsibilities and authorities;
- document registers, master lists or indexes;
- list of controlled documentation and its location; and
- archive records (some of which might be held in accordance with legal or other time requirements).

4.4.7 Operational control

Once it has gained an understanding of its OH&S hazards (4.3.2), the organization should implement the operational controls that are necessary to manage the associated risks and comply with applicable OH&S legal and other requirements.

The organization should determine those operations and activities that are associated with the identified hazard(s) where the implementation of controls is necessary to manage the OH&S risk(s). This should include the management of change (see 4.3.2).

For those operations and activities, the organization should implement and maintain:

- a) operational controls, as applicable to the organization and its activities; the organization should integrate those operational controls into its overall OH&S management system;
- b) controls related to purchased goods, equipment and services;
- c) controls related to contractors and other visitors to the workplace;
- d) documented procedures, to cover situations where their absence could lead to deviations from the OH&S policy and the objectives; and
- e) stipulated operating criteria where their absence could lead to deviations from the OH&S policy and objectives.

When developing operational controls, consideration should be given to control options with higher reliability in preventing injury or ill health, consistent with the hierarchy of controls.

Annex F provides guidance on the principles and practicalities of operational controls.

Operational controls should be reviewed on a periodic basis to evaluate their ongoing suitability and effectiveness. Changes that are identified as necessary should be implemented (see 4.3.2).

In addition, procedures should be in place to determine circumstances where new controls and/or modifications of existing operational controls are needed. Proposed changes to existing operations should be evaluated for OH&S hazards and risks before they are implemented. When there are changes to operational controls, the organization should consider whether there are new or modified training needs (see 4.4.3).

4.4.8 Emergency preparedness and response

The organization should establish, implement and maintain a procedure(s):

- a) to identify the potential for emergency situations; and
- b) to respond to such emergency situations.

The organization should respond to actual emergency situations and prevent or mitigate associated adverse OH&S consequences.

In planning its emergency response the organization should take account of the needs of relevant interested parties, e.g. emergency services and neighbours.

The organization should periodically test its procedure(s) to respond to emergency situations, where practicable, involving relevant interested parties as appropriate.

The organization should also periodically review and, where necessary, revise its emergency preparedness and response procedure(s), in particular, after periodical testing and after the occurrence of emergency situations.

Emergency preparedness goes beyond first aid and emergency evacuation arrangements. There is a need to identify all potential emergency situations and to put in place plans to mitigate the risk of such eventualities. Good practice would include measures that go beyond dealing with the immediate emergency and take account of recovery and dealing with issues arising from an emergency other than those that affect continuity of operations.

Emergency response procedures should be periodically tested "where practicable". This means that such testing has to be performed if it is capable of being conducted. Annex I provides further guidance on emergency preparedness and response.

4.5 Checking

4.5.1 Performance measurement and monitoring

The primary purpose of measuring health and safety performance is to judge the implementation and effectiveness of the arrangements for controlling risk.

The organization should establish, implement and maintain a procedure(s) to monitor and measure OH&S performance on a regular basis. This procedure(s) should provide for:

- a) both qualitative and quantitative measures, appropriate to the needs of the organization;
- b) monitoring of the extent to which the organization's OH&S objectives are met;
- c) monitoring the effectiveness of controls (for health as well as for safety);
- d) proactive measures of performance that monitor conformity with the OH&S programme(s), controls and operational criteria;
- e) reactive measures of performance that monitor ill health, incidents (including accidents, near-misses, etc.), and other historical evidence of deficient OH&S performance; and
- f) recording of data and results of monitoring and measurement sufficient to facilitate subsequent corrective action and preventive action analysis.

Performance measurement provides information on the progress and current status of the arrangements (processes and activities) used by an organization to control risks to health and safety. Monitoring involves collecting information, such as measurements or observations, over time.

Measurement information sustains the operation and development of the OH&S management system, and so controls the risk, by:

- a) providing information on how the system operates in practice;
- b) identifying areas where corrective action is necessary;
- c) providing a basis for continual improvement; and
- d) providing feedback and motivation.

Performance measurement should be carried out both proactively and reactively and should include consideration of both leading and lagging performance indicators.

Annex J provides guidance on measuring performance, including the application of leading and lagging performance indicators.

The performance measures chosen should be appropriate to the nature of the hazards and risks presented by the organization's activities. In particular, for organizations in the major hazards sector with the potential for low-probability high-hazard events, such as major releases of flammable or toxic material, the measures chosen should be specific to measuring performance against prevention of such events.

Although the primary focus for performance measurement is to meet the internal needs of the organization, there is an increasing need to demonstrate to external stakeholders (regulators, insurance companies, shareholders, suppliers, contractors, members of the public, etc.) that arrangements to control health and safety risks are in place, operating correctly and are effective. Health and safety performance should be communicated to the organization's various stakeholders as appropriate.

If equipment is required to monitor or measure performance, the organization should establish and maintain procedures for the calibration and maintenance of such equipment, as appropriate. Records of calibration and maintenance activities and results should be retained.

4.5.2 Evaluation of compliance

Consistent with its commitment to compliance [see 4.2c)], the organization should establish, implement and maintain a procedure(s) for periodically evaluating compliance with applicable legal requirements and other OH&S requirements to which it subscribes (see 4.3.3).

The organization may wish to combine these evaluations or establish separate procedures.

The organization should keep records of the results of the periodic evaluations.

The organization should establish a procedure(s) for evaluation of compliance that suits its size, type and complexity.

A compliance evaluation can encompass multiple legal requirements or a single requirement. The organization can choose to evaluate compliance with individual requirements at different times or at different frequencies. The frequency may for instance depend on the specified time frames given in statute or on the risk and changing circumstances.

Similarly, the organization should periodically evaluate its compliance with other requirements to which it subscribes and with its policy. An organization can choose to establish a separate process for conducting such evaluations or it may choose to combine these evaluations with its evaluations of compliance with legal requirements, its management review process (4.6.2) or other evaluation processes.

A variety of inputs can be used to evaluate compliance, including:

- audits;
- the results of regulatory inspections;
- analysis of legal and other requirements;
- reviews of documents;
- records of incidents and risk assessments;
- facility inspections;
- plant, machinery, equipment and work area inspections;
- project or work reviews;
- interviews;
- analysis of results from measuring and monitoring; and
- direct observations.

4.5.3 Incident investigation, nonconformity, corrective action and preventive action

4.5.3.1 General

Arrangements should exist to ensure a consistent response to, and thorough investigation of, nonconformities and incidents. The results of investigations should be analysed and reviewed to identify common features and trends that might reveal areas for improvement. It is essential that these arrangements include the use of competent persons.

The depth and/or detail of the investigation should reflect the significance or the potential significance of the event being investigated. Investigations should establish reasons for nonconformities in order to identify underlying failures in the OH&S management system and to establish the root causes of, and learn from, events. Where necessary, existing systems or procedures should be amended to prevent recurrence of nonconformities.

Investigations are also necessary to:

- a) satisfy legal recording and reporting requirements;
- b) collect information which might be needed if the incident becomes the subject of legal action;
- c) collect information for potential insurance claims;
- d) maintain records for other purposes specific to the organization; and
- e) review the adequacy of risk assessments in place.

Arrangements should ensure that appropriate managers are responsible for carrying out the investigations with the support of health and safety advisers, technical support and workers, where necessary. Arrangements to involve external investigative agencies, where necessary, should be clearly defined.

Investigations should identify both the immediate circumstances and the underlying organizational causes. Recommendations should be made on measures to improve the management system and arrangements, risk controls and risk control systems. Systems should be in place to ensure that remedial actions arising from investigations are prioritized, tracked and completed. Organizational and policy changes should be considered and recommendations made. Such recommendations should be reported to the level of management with the authority to initiate the necessary remedial action.

Following reviews actions should be prioritized and incorporated into an action plan. Essential and urgent actions should be given a high priority. All actions should be assigned to a responsible individual and progress on implementation monitored.

Where fundamental changes cannot be made immediately or within a reasonable time, properly assessed, short-term measures should be taken to control the risk in the meantime.

4.5.3.2 Incident investigation

The organization should establish, implement and maintain a procedure(s) to record, investigate and analyse incidents in order to:

- a) determine underlying OH&S deficiencies and other factors that might be causing or contributing to the occurrence of incidents;
- b) identify the need for corrective action;
- c) identify opportunities for preventive action;
- d) identify opportunities for continual improvement; and
- e) communicate the results of such investigations.

The investigations should be performed in a timely manner.

Any identified need for corrective action or opportunities for preventive action should be dealt with in accordance with the relevant parts of 4.5.3.3.

The results of incident investigations should be documented and maintained.

A good system for incident investigation offers the organization opportunities to:

- prevent recurrence of incidents and identify opportunities for proactive improvement; and
- raise the overall OH&S awareness in the workplace.

The purpose of the procedure(s) is to provide a structured, proportionate and timely approach to identifying and dealing with the underlying (root) cause(s) of an incident.

All incidents should be evaluated to determine the level of detail required of any investigation. The organization should seek to prevent the under-reporting of incidents.

In determining the nature of the investigation, the resources needed, and the priority to be given to investigation of an incident, account should be taken of:

- the actual outcome and consequences of the incident; and
- the frequency of such incidents and their potential consequences.

In developing those procedures the organization should give consideration to the following:

- the need for a common understanding and acceptance of what constitutes an “incident” (see 3.13) and the benefits that can be gained from its investigation;
- that reporting should capture all types of incidents, including major and minor accidents, emergencies, near-misses, instances of ill health and those that take place over a period of time (e.g. exposure);
- defining the reporting requirements appropriate for different types of incident;
- the need to meet any legal requirements relating to the reporting and investigation of incidents, e.g. maintenance of a register of accidents;
- defining the assignment of responsibilities and authorities for the reporting of incidents and subsequent investigations;
- the need for immediate action to deal with imminent risks;
- the need for investigation to be impartial and objective;
- the need to focus on determining causal factors;
- the benefits of involving those with knowledge of the incident;
- defining the requirements for the conduct and recording of the various phases of the investigation process, such as:
 - gathering facts and collecting evidence in a timely manner;
 - analysing the results;
 - communicating the need for any identified corrective action and/or preventive action; and
 - provision of feedback into the processes for hazard identification, risk assessment, emergency response, OH&S performance measurement and monitoring and management review.

Annex K provides further guidance on incident investigation.

4.5.3.3 Nonconformity, corrective and preventive action

For an OH&S management system to be effective on an ongoing basis, it is necessary to identify actual and potential nonconformity(ies), make corrections and take corrective and preventive action, preferably preventing problems before they occur. The organization can establish individual procedures to address corrective and preventive action, or a single procedure to address both.

The organization should establish, implement and maintain a procedure(s) for dealing with actual and potential nonconformity(ies) and for taking corrective action and preventive action. The procedure(s) should define requirements for:

- a) identifying and correcting nonconformity(ies) and taking action(s) to mitigate their OH&S consequences;
- b) investigating nonconformity(ies), determining their cause(s) and taking actions in order to avoid their recurrence;

- c) evaluating the need for action(s) to prevent nonconformity(ies) and implementing appropriate actions designed to avoid their occurrence;
- d) recording and communicating the results of corrective action(s) and preventive action(s) taken; and
- e) reviewing the effectiveness of corrective action(s) and preventive action(s) taken.

Nonconformity (3.16) is a non-fulfilment of a requirement. A requirement can be stated in relation to the management system or in terms of OH&S performance. Examples of typical nonconformities include:

- a) for OH&S management system performance:
 - failure of top management to demonstrate commitment;
 - failure to establish OH&S objectives;
 - failure to define responsibilities required by an OH&S management system, such as responsibilities for achieving objectives;
 - failure to periodically evaluate compliance with legal requirements; and
 - documentation being out-of-date or inappropriate.
- b) for OH&S performance:
 - failure to implement the planned programme to achieve improvements and incident reduction objectives;
 - consistent failure to achieve to performance improvement objectives;
 - failure to meet legal or other requirements;
 - failure to record incidents;
 - failure to implement corrective action in a timely manner;
 - consistent high rates of illness or injury that are not being addressed;
 - deviations from OH&S procedures; and
 - introduction of new materials or processes without appropriate risk assessments being conducted.

The need for corrective action and preventive action can be identified from the results of:

- a) periodic tests of emergency procedures;
- b) incident investigations;
- c) internal or external audits;
- d) the periodic evaluations of compliance;
- e) performance monitoring;
- f) maintenance activities;
- g) employee suggestion schemes and feedback from employee opinion/satisfactions surveys; and
- h) exposure assessments.

Any corrective action or preventive action taken to eliminate the causes of actual and potential nonconformity(ies) should be