

Occupational health and safety management systems — Guide

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Committees responsible for this British Standard

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- Association of British Certification Bodies
- Association of British Insurers
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- BEAMA Ltd.
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Foreword

This British Standard has been prepared by Technical Committee HS/1. It supersedes BS 8800:1996, which is withdrawn.

This revision has been prepared to reflect national and international occupational health and safety (OH&S) issues which have arisen since the publication of BS 8800:1996. These include the publication of OHSAS 18001:1999, Occupational health and safety management systems — Specification [1] and OHSAS 18002:2000, Occupational health and safety management systems — Guidelines for the implementation of OHSAS 18001 [2] and the International Labour Organisation's ILO-OSH 2001, Guidelines on occupational safety and health management systems [3]. This British Standard reflects the approach given in HSG 65, Successful health and safety management [4], but incorporates elements of ILO-OSH 2001, in particular the initial status review (ISR) (see 3.2).

This British Standard gives guidance on OH&S management systems to assist organizations in achieving compliance with stated OH&S policies and objectives and on how OH&S should be integrated within the organization's overall management system. The annexes have been updated and include the following:

- Comparison between this guide; BS EN ISO 9001; BS EN ISO 14001; OHSAS 18001 and ILO-OSH 2001 (Annex A);
- Guidance on organizing (Annex B);
- Promoting an effective OH&S management system (Annex C);
- Guidance on planning and implementing (Annex D);
- Guidance on risk assessment and control (Annex E);

NOTE This has been developed to provide additional guidance on the practicalities of the assessment process and to place greater emphasis on risk control.

- Measuring performance and audit (Annex F);
- Hazardous event investigation (Annex G).

There are sound economic reasons for reducing work related accidents and ill health, as well as ethical and regulatory reasons. Effective OH&S management promotes business efficiency, reduces costs and makes good business sense. A comprehensive legal framework already exists for OH&S, requiring organizations to manage their activities in order to anticipate and prevent circumstances that might result in occupational injury or ill health. This British Standard seeks to improve the OH&S performance of organizations by providing guidance on how the management of OH&S can be integrated with the management of other aspects of business performance, in order to:

- a) minimize risk to employees and others;
- b) improve business performance; and
- c) assist organizations to establish a responsible image within the marketplace.

This standard shares common management system principles with the BS EN ISO 9000, *Quality management* series and the BS EN ISO 14000, *Environmental management* series of standards, but these are not required for the implementation of this British Standard. This guide is consistent with:

- ILO-OSH 2001, Guidelines to health and safety management systems [3];
- OHSAS 18001, Occupational health and safety management systems — Specification [1];
- The Health & Safety Commission's, Management of Health and Safety at Work Regulations 1999, Approved Code of Practice [5];
- The Health & Safety Executive's booklet HSG65: Successful health and safety management [4];

This publication contains guidance and recommendations. It should not be quoted as if it were a specification and should not be used for certification purposes.

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 does not of itself confer immunity from legal obligations.

Summary of pages

This document comprises a front cover, an inside front cover, pages i to iv, pages 1 to 69 and a back cover.

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Introduction

OH&S management systems are critical in maintaining a healthy and safe working environment. Measures in place to control risks must be managed in accordance with the Management of Health and Safety at Work Regulations 1999 [5] to ensure that they are and remain in place; are used and remain effective in reducing risk to as low a level as reasonably practicable. The importance of managing OH&S effectively is increasingly highlighted in both the media and official reports of major accidents, resulting in greater emphasis on the management of OH&S in legislation. Several parties can have a legitimate interest in an organization's approach to OH&S including: employees; customers/clients/suppliers; the community; shareholders; contractors; insurers; as well as regulatory agencies. The aim for the organization is to ensure that their OH&S management systems meet these needs in a balanced way. The importance of managing OH&S effectively is increasingly highlighted in both the media and official reports of major accidents, resulting in greater emphasis on the management of OH&S in legislation. The profile of occupational health has become higher in recent years, with growing awareness of the need for proper protection of those exposed to risks in the workplace, taking account of the health needs of individuals.

Managing health and safety adds value to businesses helping to improve overall performance. More and more organizations attach the same importance to achievement of high standards in OH&S management as they do to other key aspects of their business activities. This demands the adoption of a structured approach to the identification of hazards and the evaluation and control of work-related risks.

This guide is intended to help organizations develop a framework for managing OH&S so that employees and others whose health and safety might be affected by the organization's activities are adequately protected. Many of the features of effective OH&S management are identical to management practices advocated by proponents of quality and business excellence. These guidelines are based on the general principles of good management and are designed to enable the integration of OH&S management within an overall management system. Various approaches could equally well be adopted, but this guide is based on HSE guidance Successful health and safety management HSG65 [4] and is designed for organizations wishing to base their OH&S management systems on this approach.

Human factors including the culture, attitudes and beliefs within organizations can make or break the effectiveness of any management system and need to be managed very carefully when implementing this guide.

Figure 1 illustrates part of a cycle for continually improving OH&S management and its integration within the overall management system. By following the stages in Figure 1, as described in Clause 3, organizations are able to set OH&S policy and objectives, establish procedures for their implementation and demonstrate achievement against their defined criteria.

While the general principles outlined in the annexes apply to all organizations, small organizations need to be proportionate in implementing these guidelines. The guidance contained in this British Standard will assist organizations in continually improving their performance beyond legal compliance.

NOTE Lists provided in this guide are not intended to be definitive or exhaustive.

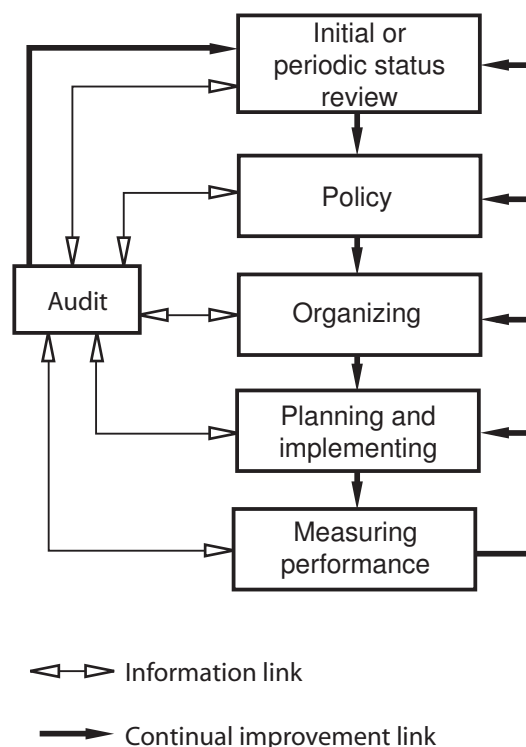


Figure 1 — Elements of successful health and safety management based on the approach in HSG65

1 Scope

This guide is intended to help those with responsibility for ensuring OH&S issues are managed effectively to develop and maintain their own system.

This British Standard gives guidance on:

- a) the design and implementation of OH&S management systems;
- b) the evaluation of effective OH&S management with a view to continual improvement;
- c) the relationships to and integration of an OH&S management system with other management systems standards.

This guide is intended for use by organizations of all sizes and regardless of the nature of their activities. It is intended that its application is proportional to the circumstances and needs of the particular organization.

2 Terms and definitions

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

2.1

accident

undesired event giving rise to death, ill health, injury

2.2

audit

systematic and independent process for obtaining evidence and evaluating it objectively to determine the extent to which specified criteria are fulfilled

NOTE Independent does not necessarily mean external to the organization.

2.3**competent person**

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

2.4**continual improvement**

recurring process of enhancing the occupational OH&S management system in order to achieve improvements in overall occupational health and safety performance consistent with the organizations OH&S policy

NOTE 1 The process need not take place in all areas of activity simultaneously.

NOTE 2 [Adapted from BS EN ISO 14001].

2.5**hazard**

source or situation with a potential for harm in terms of death, ill health or injury, or a combination of these

2.6**hazard identification**

process of recognizing that a hazard exists and defining its characteristics

2.7**hazardous event**

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

NOTE This could include long-term exposure.

2.8**OH&S objectives**

goals, in terms of OH&S performance, that an organization sets itself to achieve

2.9**health surveillance**

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

2.10**ill health**

identifiable disease or adverse health condition that is judged to have been caused by or made worse by a person's work activity or environment

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

2.11**incident**

hazardous event where no harm occurs

2.12**integration**

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

2.13**interested party**

person or group concerned with, affecting or affected by the health and safety performance of the organization

2.14**management system**

series of elements for establishing policy, objectives and arrangements for implementation and continual improvement

2.15

organization

company, corporation, firm, enterprise, authority or institution, or part or combination thereof, whether incorporated or not, public or private, that has some autonomy over its administration

NOTE 1 For organizations with more than one operating unit a single operating unit can be defined as an organization.

NOTE 2 [Adapted from BS EN ISO 14001].

2.16

risk

combination of the likelihood and consequence(s) of a specified hazardous event

2.17

risk assessment

process of identifying hazards and evaluating the risks to health and safety arising from these hazards taking account of the existing risk controls (or, in the case of a new activity, the proposed risk controls)

2.18

risk control

selection and application of suitable measures to reduce risk

2.19

status review

formal evaluation of the OH&S management system

2.20

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

2.21

worker representative

safety and health representative and or representative of employee safety and health

3 OH&S management system elements

3.1 General

Within some organizations elements of the OH&S management system might already be in place, such as the policy and risk assessment records, but others need to be developed further. However, 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 depends on factors such as the size of the organization, the nature of its activities, the hazards and the conditions in which it operates. Whilst there are various methods of developing the elements it is recommended that the guidance in Annex B, Annex C, Annex D, Annex E, Annex F and Annex G should be followed.

3.2 Initial status review

An initial status review should be carried out in all organizations that do 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 workforce or its representatives. The review should establish to what extent existing arrangements are in place for:

- a) identifying and meeting the requirements of relevant legislation and regulations dealing with OH&S management issues (see 3.5.4);
- b) identifying and implementing best practice and performance in the organizations employment sector and other appropriate sectors (e.g. from relevant HSC industry advisory committees and trade association guidelines) (see 3.5.4);
- c) obtaining or developing guidance on OH&S management and making it available throughout the organization (see 3.4.3);
- d) consultation within and disseminating information throughout the organization (see 3.4.3);
- e) identifying, anticipating and assessing hazards and risks to health and safety arising out of the work environment and work activities (see 3.5.3);
- f) ensuring the health and safety of those involved in, or affected by, work activities (see 3.5.3);
- g) developing and implementing effective risk controls to eliminate hazards and minimize risk to health or safety (see 3.5.3);
- h) measuring and evaluating OH&S management performance (see 3.6);
- i) establish effective arrangements for the review and audit of the OH&S management system (see 3.8 and 3.9).

The results of the initial status review should:

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

An effective approach to the initial status review is to review each element of the existing or proposed management system against the guidelines for each element of the process described in this standard.

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

3.3 OH&S policy

An effective OH&S policy should demonstrate the organization's commitment to OH&S. 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. The organization's top management should set in place procedures to define, document and endorse its OH&S policy. 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:

- a) recognizing and implementing OH&S as an integral part of improving business performance;
 - b) achieving a high level of OH&S performance, and a commitment to continual cost-effective improvement in performance;
- NOTE Attention is drawn to the legal duty to reduce risk to as low a level as is reasonably practicable.
- c) minimizing risk and the prevention of injury, ill health, diseases and incidents;
 - d) acknowledging that people are the key resource and promoting the general health and safety of employees;
 - e) providing adequate and appropriate resources to implement the policy including access to competent specialist advice where necessary;
 - f) setting and publishing OH&S objectives at a minimum by internal notification;
 - g) placing management of OH&S as a prime responsibility of line management from most senior executive to first-line supervisory level;
 - h) ensuring its understanding, implementation and maintenance at all levels in the organization;
 - i) ensuring employee involvement, participation and consultation to gain commitment to the policy and its implementation;

- j) ensuring that employees at all levels receive appropriate training and are competent to carry out their duties and responsibilities;
- k) periodically reviewing the policy, the management system and audit of compliance to policy, as a driver of continual improvement;
- l) 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 list. 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 and policy statement should be reviewed, revalidated and where necessary revised by top management as often as necessary. 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 3.5.6).

3.4 Organizing

3.4.1 General

Responsibilities and relationships 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 co-operation between individuals, safety 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 employees and the selection of competent contractors;
- e) provide clear and visible leadership on OH&S;
- f) ensure continual improvement.

3.4.2 Responsibilities

3.4.2.1 Management responsibilities

Ultimate responsibility for OH&S rests with the managing director, board of directors or management board as appropriate (see HSE Directors' responsibilities for health and safety [6] for further information). In very small organizations the responsibility lies with the owner or senior partner. Good practice is to appoint a person at the top management level (e.g. in a large organization, a board or executive committee member) who has particular responsibility, accountability and authority for:

- a) ensuring that the OH&S management system is properly developed, implemented and performing to expectations in all locations and spheres of operation within the organization (see Annex C);
- b) ensuring that where necessary one or more competent persons are appointed to help undertake the measures needed;
- c) the achievement of all OH&S objectives;
- d) the management review (see 3.9.3) and evaluation of the OH&S management system; and
- e) the periodic and comprehensive reporting to the top management on the OH&S management performance.

Top management should demonstrate, by example, their commitment by being actively involved in the continual improvement of OH&S performance.

3.4.2.2 General responsibilities

All levels of the organization should be competent, trained and fully aware of the relevance and importance of their activities and how they contribute to the achievement of the organization's OH&S objectives (see **B.4**). All employees should be made aware of the following:

- 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) the influence that their action or inaction can have on the effectiveness of the OH&S management system.

Systems should be in place to encourage employees to report shortcomings in the OH&S arrangements, make suggestions for improvements and be involved, where appropriate, in the development of new or improved OH&S arrangements and procedures.

3.4.2.3 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 to those involved. Where job descriptions are used they should include such responsibilities.
- b) Responsibilities should be reasonable and all employees should be given the authority and resources (including time) necessary to carry out their responsibilities.
- c) Appropriate arrangements should exist whereby employees 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.

In addition to any allocated responsibilities, all employees should be made aware that they have a general responsibility for their own and others' health and safety (see **B.4**).

3.4.3 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 B). 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 **3.5.3**);
- c) define the allocation of responsibilities and accountabilities in the management structure (see **3.4.2**);
- d) ensure employees have the necessary skills and authority to carry out their responsibilities;
- e) allocate adequate resources commensurate with the size of the organization and the nature of its activities;
- f) identify existing skills, knowledge, expertise, competencies actually required and any gaps between them. This should be carried out at all levels within the organization and any necessary training provided;
- g) make effective arrangements for employee involvement, participation, consultation and representation where appropriate;
- h) effectively communicate OH&S information to all interested parties;
- i) effectively communicate with external agencies, (such as the enforcement agencies, emergency service etc.) where appropriate.

3.5 Planning and implementing

3.5.1 General

Planning is an integral part of all elements of an OH&S management system as described in Clause 3 and illustrated in Figure 1. However, in this clause planning refers explicitly to the development of plans for continual improvement and the design, development and implementation of risk assessment and control. An effective OH&S management system should be planned to:

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

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.

Planning an OH&S management system involves:

- 1) designing, developing and installing suitable management arrangements, workplace precautions and their associated risk control systems proportionate to the needs, hazards and risks of the organization (see Annex E); and
- 2) operating, maintaining and improving the system to suit changing needs and process hazards and risks.

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

The planning process should address the following key areas:

- setting objectives (see 3.5.2);
- risk assessment and risk control (see 3.5.3);
- legal and other requirements (see 3.5.4);
- OH&S management arrangements (see 3.5.5).

3.5.2 Setting objectives

It is important that the criteria for judging success or failure of the planned activity are transparent. The OH&S objectives are identified either based on the results of the initial status review, subsequent periodic reviews (see 3.9.2) or other available data. Clear performance and measurement criteria defining what is to be done, who is responsible, when it is to be done and the desired outcome should be set.

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 relative to its size, the nature of its activities, the hazards, risks and the conditions in which it operates.
- c) Suitable and specific performance indicators should be chosen to measure whether objectives have been or are being achieved. These indicators should be defined before moving to the next stage.
- d) Plans should be prepared to achieve each objective. The plan should be developed first in broad terms and then in detail as performance needs: the specified tasks that have to be carried out by designated people or teams to implement the plan.
- e) Adequate financial, human resources and technical support should be made available.
- f) The full implementation of plans should be measured.
- g) The plans' successes in achieving objectives should be measured.
- h) The objectives and plans should be reviewed as a basis for continual improvement.

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

3.5.3 Risk assessment and risk control

It is essential that there is a comprehensive appreciation of the significant OH&S hazards and risks associated with the organization's undertakings. Where hazards cannot be eliminated the organization should ensure that appropriate and effective risk controls are provided to reduce risks to acceptable or tolerable levels. 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. It could be that the effort needed to achieve this is disproportionate to that needed for the day-to-day risks of the organization.

The planning process should define the arrangements for:

- a) ongoing, pro-active identification of hazards and assessment of risks to OH&S arising out of the work environment and work activities;
- b) the development and implementation of effective workplace precautions and their associated risk control systems that eliminate hazards or reduce risk;
- c) recording the significant details and findings of the risk assessment and making them available to those who need the information.

A risk assessment should always be carried out, and the control measures implemented, before changes are made to work activities or before new activities commence.

Depending on the nature of the change and circumstances the risk assessment could differ in depth and detail. Temporary measures might need to be taken in certain circumstances but should always be confirmed by full risk assessment.

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

3.5.4 Legal and other requirements

The organization should establish and maintain arrangements to ensure identification and access to all current and emerging legal and other OH&S requirements and guidance relevant to their activities and services. Relevant employees within the organization should be aware of and understand these requirements.

The organization should seek to emulate best practice and performance, in the organization's business sector and other appropriate sources, (e.g. from regulatory agency and trade association guidelines). Best practice guidelines can be of great assistance and arrangements should be made for their identification, dissemination and use.

3.5.5 OH&S 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 six elements of the model (policy, organizing, planning and implementation, measuring performance, audit and review).

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

- a) overall plans and objectives, including employees and resources, for the organization to implement its policy;
- b) operational plans to implement arrangements to control the risks identified in 3.5.3 and to meet the recommendations identified in 3.5.4;
- c) contingency plans for foreseeable emergencies and to mitigate their effects (e.g. prevention, preparedness and response procedures);
- d) planning for organizational activities (see 3.4.3);
- e) plans covering the management of change of either a permanent or temporary nature (e.g. associated with new processes or plant, working procedures, production fluctuations, legal requirements organizational and staffing changes);
- f) plans covering interactions with other interested parties, (e.g. control, selection and management of contractors, liaison with emergency services, visitor control);
- g) planning for measuring performance, audits and status reviews (see 3.6, 3.8 and 3.9);
- h) implementing corrective actions;
- i) plans for assisting recovery and return to work of any staff who is injured or becomes ill through their work activities.

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

3.5.6 Implementing and documenting

Workplace precautions, risk control systems and management arrangements are more effective if they are well designed and developed recognizing existing business practice. The strength and limitations of human behaviour should be considered in the design.

All the components of the OH&S management system should be adequately inspected, maintained and monitored to ensure continued effective operation. Risk assessment and risk control should be reviewed in the light of changes and technological developments.

Documentation is vital in enabling an organization to communicate and implement a successful management system. It is also important in assembling and retaining OH&S knowledge. It is important that documentation is:

- a) tailored to the organization's needs;
- b) detailed proportionate to the level of complexity, hazards and risks;
- c) kept to the minimum required for effectiveness and efficiency.

Among the most important written communications are:

- 1) health and safety policy statements;
- 2) organization statements showing health and safety roles and responsibilities (see **3.4.2**);
- 3) documented performance requirements and measures;
- 4) supporting organizational and risk control information and procedures;
- 5) appropriate findings from initial status reviews (see **3.2**), risk assessments investigations (see **3.5.3**), audits (see **3.8**) and periodic status reviews (see **3.9.2**).

The organization should maintain any records necessary to:

- i) demonstrate compliance with legal and other requirements;
- ii) ensure retention of appropriate OH&S knowledge;
- iii) mitigate any liability claims.

Organizations should ensure that sufficient documentation is available to enable OH&S plans to be fully implemented and is proportional to their needs (see **B.5**).

Organizations should make arrangements to ensure that OH&S documentation is up to date, applicable to the purpose for which it is intended taking into account requirements of data protection legislation and communicated to all those who need it.

3.6 Measuring performance

The primary purpose of measuring health and safety performance is to judge the implementation and effectiveness of the arrangements for controlling risk. Performance measurement provides information on the progress and current status of the arrangements (strategies, processes and activities) used by an organization to control risks to health and safety.

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.

Health and safety performance measurement should seek to answer such questions as the following.

- 1) Where are we now relative to our overall health and safety aims and objectives?
- 2) Where are we now in controlling hazards and risks?
- 3) How do we compare with others?
- 4) Why are we where we are?
- 5) Are we getting better or worse over time?
- 6) Is our management of health and safety effective (doing the right things)?
- 7) Is our management of health and safety reliable (doing things right consistently)?
- 8) Is our management of health and safety proportionate to our hazards and risks?
- 9) Is our management of health and safety efficient?
- 10) Is an effective OH&S system in place across all parts of the organization?
- 11) Is our culture supportive of health and safety, particularly in the face of competing demands?
- 12) Are there any aspects of our OH&S management that can be readily improved?

These questions should be asked at all management levels including the top management level. Managers across the organization should be given the responsibility, accountability and authority for performance measurement in the areas for which they are responsible. The aim should be to provide a complete picture of the organization's health and safety performance.

Both qualitative and quantitative measures should be taken where appropriate and should be tailored to the needs of the organization (see Annex F).

Performance measurement should be carried out both proactively and reactively and should include consideration of both leading and lagging performance indicators (see Annex F).

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.

3.7 Investigation and response

Arrangements should exist to ensure a consistent response to, and thorough investigation of, substandard performance including accidents. The results of investigations should be analyzed 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 substandard performance 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 recurrences.

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;
- 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 employees, 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, workplace precautions 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 minimize the risk in the meantime.

3.8 Audit

In addition to measurement of OH&S performance and periodic status reviews (see **3.9.2**), there should be periodic audits that enable a deeper and more critical appraisal of all the elements of the OH&S management system (see Figure 1). The programme of audits should be proportionate to the nature of the organizations hazards and risks. To maximize the benefits, audits should be conducted by competent persons independent of the area or activity being audited (see Annex F).

Auditors should collect evidence from interviews, documents and worksite visits, and check for consistency.

While audits need to be thorough, their approach and frequency should be tailored to the size of the organization and the nature of its hazards and the results of previous audits.

At different times and for different reasons audits need to cover the following.

- a) Is the established OH&S management system understood and implemented?
- b) Is the organization's overall OH&S management system capable of achieving the required standards of OH&S performance?
- c) Is the organization fulfilling all its obligations with regard to OH&S?
- d) What are the strengths and weaknesses of the OH&S management system?
- e) Is the organization actually doing and achieving what it claims?

Audits can be comprehensive or address selected topics according to circumstance. The results of audits should be made available, communicated and corrective action taken as required.

The audit reports containing both favourable and unfavourable conclusions should be used by top management in the management review (see **3.9.3**).

3.9 Reviewing performance

3.9.1 General

There are two review processes, namely periodic status review (see **3.9.2**) and management review (see **3.9.3**) that are the major drivers for continual improvement.

The periodic status reviews should be carried out at an appropriate level within the organization, in contrast management reviews should be undertaken by top management.

3.9.2 Periodic status review

The purpose of the periodic status review is to make judgements about the adequacy of performance throughout the organization. The output should be used to make decisions about the nature and timing of actions necessary to remedy deficiencies or compensate for changes. In general, the periodic status review follows a similar approach to that used for the initial status review (see **3.2** and **D.4**).

The periodic status review should consider:

- a) the overall performance of the OH&S management system;
- b) the performance of individual elements of the system (see Figure 1);

- c) the findings of audits (see 3.8);
- d) internal and external factors, such as changes in organizational structure or production patterns, pending legislation, introduction of new technology, etc.

This information should be used to review the performance of the organization against its policy and objectives, to improve the organization's approach to:

- minimizing risk;
- improving business performance;
- allowing comparisons to be made between its performance and other organizations in the same (and different) business sector.

The periodic status review also provides an opportunity to anticipate potential future changes.

It is essential that the findings of the review should be translated, where appropriate, into definite changes and improvements to the OH&S management system (see Figure 1). Annex D provides a structured approach for making changes to any element of the management system deemed necessary.

Reviewing performance is based on information from measuring activities (including both proactive and reactive monitoring), incident investigations and from auditing activities.

Performance measurement is a continual process and responses to the findings are undertaken at various levels within an organization, and include, for example:

- 1) responses by line supervision to remedy failures to implement workplace precautions and risk control systems which they observe in the course of routine activities;
- 2) responses to remedy specific examples of substandard performance which are identified by reactive or proactive monitoring;
- 3) responses to the assessment of plans and objectives either at the individual, department, site, group or organizational level.

The effectiveness of the review process is enhanced by:

- i) clearly establishing who is responsible for implementing the remedial action identified in the review process;
- ii) setting deadlines for the completion of remedial action.

3.9.3 Management review

Top management should review the organization's OH&S management system, at planned intervals, to ensure its continuing suitability, adequacy and effectiveness. This review should include assessing opportunities for improvement and the need for changes in the OH&S management system including the OH&S policy and objectives. The results of the management review should be documented.

The inputs to management review should include, among other information, the following:

- results of the periodic status review;
- results of OH&S management system audits;
- communications from interested parties;
- the performance of the OH&S management system;
- the extent to which objectives have been met;
- status of corrective and preventive actions;
- follow-up actions from previous management reviews;
- changing circumstances; and
- recommendations for improvement.

The outputs from the management review should include any decisions and actions related to possible change to OH&S policy, objectives and other elements of the OH&S management system, consistent with the commitment to continual improvement.

The findings of the review should be documented and communicated to ensure appropriate action, where necessary. They can also be incorporated within performance reports (e.g. annual report, corporate governance and social responsibility statements) for communication to their various stakeholders, including shareholders.

Annex A (informative)

Comparison with other management system standards

A.1 General

Ideally, the health and safety arrangements of an organization are integrated into the overall management system. This annex considers integration with BS EN ISO 9001:2000, BS EN ISO 14001:2005, OHSAS 18001:1999 and ILO-OSH 2001, although the principle applies to other management systems. The aim is to provide users with guidance as to how they can incorporate the elements of their OH&S management system into other management systems.

No major difficulty is posed by the integration of BS 8800 into the above management systems or vice versa. There are no fundamental differences between any of the management systems discussed. The requirements of the common elements used in all the approaches show a large amount of overlap with approximately 70 % upwards being common requirements. The differences therefore largely relate to scope with respect to BS EN ISO 9001:2000 and BS EN ISO 14001:2005 and the specific needs of OH&S versus the quality and environment specifications. The distinction between BS 8800 and OHSAS 18001 and ILO-OSH 2001 is mainly in the order in which the elements are addressed. The intent and basic requirements are common to all three documents.

BS 8800:2004 and ILO-OSH 2001 are guides. A guide gives broad and general information about a subject, with background information and recommendations where appropriate. The wording of a guide is usually in the form of descriptive statements and recommendations using the auxiliary “should”.

OHSAS 18001:1999, BS EN ISO 9001:2000 and BS EN ISO 14001:2005 are specifications. Specifications set out detailed requirements, using the prescriptive “shall”, to be satisfied by a product, material, process or system and the procedures for checking conformity to these requirements.

A.2 Integration of BS 8800:2004 and BS EN ISO 9001:2000

A.2.1 General

The quality management system can selectively be applied to the output alone. Sometimes it is not applied to specific activities unless the organization has extended the system to Total Quality Management or an Excellence model. OH&S, on the other hand, cannot be so restricted and applies to all employees of the organization as well as visitors and contractors and anyone affected by the organization’s activities.

A second distinction is the importance of risk assessment and control in any OH&S system. Risk assessment and control is fundamental to the effective operation of the system and a legal requirement. It is not given the same degree of importance in BS EN ISO 9001:2000 and it is vital that care is taken to ensure that it is adequately covered in an integrated system. It might therefore be preferable to provide a more generic framework for your system if it is decided to combine OH&S and quality, which encompasses the elements of risk control, legal and other requirements and the emergency preparedness elements recommended by BS 8800:2004.

The best way of integrating an OH&S system with a quality management system based on BS EN ISO 9001:2000 depends on the details of the systems in operation within a particular organization. There is no right or wrong way. The following list makes some suggestions but the details are different for different organizations.

Table A.1 — Comparison of BS 8800:2004 and BS EN ISO 9001:2000

Element	Comparison	
	BS 8800:2004	BS EN ISO 9001:2000
Initial status review (see A.2.2)	Yes (see 3.2)	No
Policy (see A.2.3)	Yes (see 3.3)	Yes (see 5.3)
Organizing (see A.2.4)	Yes (see 3.4)	Yes (see 5.5)
Planning and implementation (see A.2.5)	Yes (see 3.5)	Yes (see 5.4 and 7.1)
Performance measurement including investigation and response (see A.2.6)	Yes (see 3.6 and 3.7)	Yes (see Clause 8)
Audit (see A.2.7)	Yes (see 3.8)	Yes (see Clause 8)
Reviewing performance (see A.2.8)	Yes (see 3.9)	Yes (see 5.6)
NOTE Where “Yes” has been indicated in the comparison it means that the element is either addressed either fully or in part within that standard. Where “No” is indicated the element has not been addressed within that standard.		

A.2.2 Initial status review

The initial status review is not a requirement of BS EN ISO 9001. It is, however, recommended in BS 8800 when it is thought to be beneficial to the organization. Although periodic status reviews are a regular part of the OH&S system, the initial status review is a one-off exercise at the start of the process of implementation.

A.2.3 Policy

The policy can be amplified to cover the recommendations of OH&S although BS 8800:2004 might not cover succinctly all the demands in BS EN ISO 9001:2000, **5.3**. BS EN ISO 9001:2000 specifically requires that top management ensure that the quality policy includes a commitment to comply with requirements and continually improve the effectiveness of the quality management system.

A.2.4 Organizing

The guidance given on OH&S organizing in BS 8800:2004 satisfies the requirements of BS EN ISO 9001:2000.

A.2.5 Planning and implementing

Whilst elements of BS 8800:2004 covers the planning and implementing elements of BS EN ISO 9001:2000, they sit readily under BS EN ISO 9001:2000, **7.1**. For integration purposes these elements ought to be reconciled in the same part of any integrated system. Emergency preparedness also needs to be included.

A.2.6 Performance measurement

The guidance given in BS 8800:2004 aligns well with BS ISO 9001:2000, Clause **8**, and in particular **8.1** and **8.2**.

A.2.7 Audit

The guidance given in BS 8800:2004 satisfies the requirements set out in BS ISO 9001: 2000, Clause **8** in particular **8.2.2**.

A.2.8 Reviewing performance

Both the periodic status review and the management review recommended in BS 8800:2004 can be integrated with BS EN ISO 9001:2000.

NOTE A number of sections within BS EN ISO 9001:2000 can be usefully embraced within a BS 8800 system, such as **7.2.3**, customer communication, **8.2.1** customer satisfaction where the customer is seen as being the “employee”.

A.3 Integration of BS 8800 and BS EN ISO 14001:2005¹⁾

A.3.1 General

There are no fundamental differences in the management of OH&S and environmental management systems, and there is no essential difficulty in managing the systems as an integrated whole. Whilst not all the provisions of this version of BS 8800 are matched by specific requirements in BS EN ISO 14001:2005, it can easily be expanded to cover the requirements of the environmental standard as shown in Table A.2. Equally those wishing to embrace OH&S within their environmental system will find the process has many common features.

¹⁾ In preparation.

Table A.2 — Comparison of BS 8800:2004 and BS EN ISO 14001:2005

Element	Comparison	
	BS 8800:2004	BS EN ISO 14001:2005
Initial status review (see A.3.2)	Yes (see 3.2)	Yes (guidance is given in Annex A)
Policy (see A.3.3)	Yes (see 3.3)	Yes (see 4.2)
Organizing (see A.3.4)	Yes (see 3.4)	Yes (see 4.4.1)
Planning and implementation (see A.3.5)	Yes (see 3.5)	Yes (see 4.3 and 4.4)
Performance measurement including investigation and response (see A.3.6)	Yes (see 3.6 and 3.7)	Yes (see 4.5)
Audit (see A.3.7)	Yes (see 3.8)	Yes (see 4.5.5)
Reviewing performance (see A.3.8)	Yes (see 3.9)	Yes (4.6)
NOTE Where “Yes” has been indicated in the comparison it means that the element is either addressed either fully or in part within that standard. Where “No” is indicated the element has not been addressed within that standard.		

A.3.2 Initial status review

Whilst the initial status review is not a requirement of BS EN ISO 14001: 2005, it is a good starting point to the implementation of an environmental management system and is outlined in BS EN ISO 14001:2005, Annex A. The breadth of the status review in BS 8800:2004 is greater than that considered in the environmental management standard.

A.3.3 Policy

The OH&S policy can be expanded so that it fulfils the policy requirements in BS EN ISO 14001:2005 by defining the organization’s environmental policy and ensuring that it:

- a) is appropriate to the nature, scale and environmental impacts of its activities, products and services;
- b) includes a commitment to continual improvement and prevention of pollution;
- c) includes a commitment to comply with applicable legal requirements and other requirements to which the organization subscribes which relate to its environmental aspects;
- d) provides the framework for setting and reviewing environmental objectives and targets;
- e) is documented, implemented and maintained;
- f) is communicated to all persons working for or on its behalf;
- g) is available to the public.

Equally an environmental management policy can embrace the specific recommendations of BS 8800:2004.

A.3.4 Organizing

Organizing is not dealt with as a specific topic in BS EN 14001:2005. However, BS EN 14001:2005, 4.4.1 requires that the organization’s top management appoint specific management representative(s) who, irrespective of other responsibilities, have defined roles, responsibilities and authority for:

- a) ensuring that environmental management system requirements are established, implemented and maintained in accordance with BS EN ISO 14001: 2005;
- b) reporting on the performance of the environmental management system to top management for review and as a basis for improvement of the environmental management system.

Communication is dealt with, at least in part, in 3.4 of BS 8800:2004, but the element of communication in BS EN ISO 14001:2005, 4.4.3 is much broader where it states that “the organization shall decide whether to communicate externally about its significant environmental aspects”.

A.3.5 Planning and implementation

The implementation of the system defined in BS 8800:2004 can be supplemented to incorporate the requirements of BS EN ISO 14001:2005, Clauses 4.3 and 4.4 to effectively cover the needs of the environmental management system. The implementation of BS 8800:2004 within an environmental management system is also a simple extension. Risk control is not specifically demanded by BS EN ISO 14001:2005, but is recommended. It should be borne in mind that the risk assessment approach is essential for OH&S and is not required for an Environmental Management System (EMS). Those wishing to integrate systems might need to consider a common approach for effectiveness and efficiency.

A.3.6 Performance measurement

The guidance on performance measurement in this standard can be extended to cover environmental provisions by incorporating the requirements of BS EN ISO 14001:2005, Clauses 4.5.1, 4.5.2 and 4.5.3.

A.3.7 Audit

The audit requirements of BS EN ISO 14001:2005 can be accommodated by extending the approaches given in 3.8 of this guide to include the requirements in BS EN ISO 14001:2005, 4.5.5 which are as follows:

- a) determine whether the environmental management system:
 - 1) conforms to planned arrangements for environmental management including the requirements of this International Standard; and
 - 2) has been properly implemented and is maintained;
- b) provide information on the results of audits to management.

Audit programme(s) shall be planned, established, implemented and maintained by the organization, taking into consideration the environmental importance of the operation(s) concerned and the results of previous audits.

Audit procedure(s) shall be established, implemented and maintained that address:

- the responsibilities and requirements for planning and conducting audits, reporting results and for maintaining records;
- the determination of audit criteria, scope, frequency and methods.

A.3.8 Reviewing performance

Clause 3.9 of this British Standard gives guidance on reviewing performance. There is no specific requirement for a periodic status review in BS EN ISO 14001:2005 and this is therefore optional.

The requirements for a periodic management review are generally similar and the reviews for both disciplines can be combined if desired.

A.4 Integration of BS 8800 and OHSAS 18001:1999

A.4.1 General

If the recommendations of BS 8800:2004 are applied within an organization all the requirements of OHSAS will have been addressed as shown in Table A.3. In general, the guidance in BS 8800:2004, particularly in the annexes, meets and expands upon the requirements that are given in OHSAS 18001:1999.

Table A.3 — Comparison of BS 8800:2004 and OHSAS 18001:1999

Element	Comparison	
	BS 8800:2004	OHSAS 18001:1999
Initial status review (see A.4.2)	Yes (see 3.2)	No
Policy (see A.4.3)	Yes (see 3.3)	Yes (see 4.2)
Organizing (see A.4.4)	Yes (see 3.4)	Yes (see 4.3 and 4.4)
Planning and implementation (see A.4.5)	Yes (see 3.5)	Yes (see 4.3 and 4.4)
Performance measurement including investigation and response (see A.4.6)	Yes (see 3.6 and 3.7)	Yes (see 4.5.1)
Audit (see A.4.7)	Yes (see 3.8)	Yes (see 4.5.4)
Reviewing performance (see A.4.8)	Yes (see 3.9)	Yes (see 4.6)
NOTE Where "Yes" has been indicated in the comparison it means that the element is either addressed either fully or in part within that standard. Where "No" is indicated the element has not been addressed within that standard.		