

ISO 45001: 2018 Gap Analysis

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Company:

Completed By:

ISO 45001:2018 is the first internationally agreed occupational health and safety management system (OHSMS). The standard helps organisations manage occupational health and safety processes and risks in a systematic and consistent way.

It is the replacement for BS OHSAS 18001:2007 which will be withdrawn on 12th March 2021.

This Gap Analysis enables you to determine where you are on your journey toward ISO 45001 from either having no OHSMS in place or migrating from OHSAS 18001. For organisations that already demonstrate effective leadership, especially for those Senior Management Teams familiar with ISO 9001:2015 and ISO 14001:2015 standards, you may already be on your way toward meeting the requirements. In organisations where occupational health and safety is the sole responsibility of a health and safety individual, this new standard will require significant changes to the existing system.

This document, which highlights clauses which were not previously covered or have significantly changed from OHSAS 18001, should be used in conjunction with the ISO 45001:2018 standard. You should use this Gap Analysis as an aid towards confirmation that your management system complies with the requirements of ISO 45001:2018.

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NEW CLAUSE 4 – CONTEXT OF THE ORGANISATION

This clause underpins the 2018 Standards and establishes the context of the Occupational Health and Safety Management System (OHSMS). It gives you the opportunity to identify all internal and external issues that are relevant, and may affect, the strategic direction of the organisation and the OHSMS. You will also need to identify the needs and expectations of workers and other interested parties that are relevant to your management system. These groups can include workers, shareholders, sub-contractors, regulatory groups etc. Finally, you'll need to establish, implement, maintain and continually improve the management system.

Clause 4.1 - Understanding the Organisation and its Context

You will need to be able to demonstrate that you have determined external and internal issues that are relevant to your organisation's purpose and that affect its ability to achieve the intended outcome(s) of its OHSMS. Depending on the size and/or complexity of operations, a simple approach such as asking, "what if" questions can be useful, or more structured tools such as SWOT (Strengths, Weaknesses, Opportunities and Threats) or PESTLE (Political, Economic, Social, Technological, Legal, Environmental) analysis can be used.

Consideration should be given to:

- The internal and external issues relevant to your organisation
- The process of monitoring the internal and external issues and how you have considered the impact of any changes to the issues

EVIDENCE/ACTION REQUIRED

Clause 4.2 - Understanding the Needs and Expectations of Workers and other Interested Parties

You will need to be able to demonstrate that you have identified, monitored and reviewed all interested parties that are relevant to the OHSMS and its requirements.

Consideration should be given to:

- Other interested parties (in addition to workers) that are relevant to the OHSMS
- The needs and expectations of workers and other interested parties
- Which of these needs and expectations are or could become legal requirements

EVIDENCE/ACTION REQUIRED

Clause 4.3 - Determining the Scope of the OHSMS

The standard requires you to consider the context of the organisation (Clause 4.1) and interested parties (Clause 4.2). You will need to identify any boundaries to your scope and applicability of the system. This could include the whole organisation or specific functions.

Consideration should be given to:

- The boundary and applicability of the scope
- Products and / or services included in your OHSMS
- Planned or performed work-related activities
- Has the scope changed and if so how?

EVIDENCE/ACTION REQUIRED

Clause 4.4 - Occupational Health and Safety Management System

To comply with this clause, you will need to establish, implement, maintain and continually improve your OHSMS. This now requires the adoption of a process approach. Although every organisation will be different, documented information such as process or written methods and procedures could support this.

Consideration should be given to the process-based system including:

- A list of processes, process sequences and interactions
- Methods to manage the processes (including those of procured services)
- Resources to support processes
- Process responsibilities and authorities
- Risks and opportunities of each process
- How you ensure the system improves the processes and the OHSMS

EVIDENCE/ACTION REQUIRED

NEW CLAUSE 5 – LEADERSHIP AND WORKER PARTICIPATION

Top management and their workers are now required to have involvement in the input and operation of the OHSMS management system and must ensure that the requirements are integrated into the organisation's OHSMS processes and that the policy and objectives are compatible with the strategic direction of the organisation. The new standard requires top management to take overall responsibility and accountability for the prevention of work-related injury and ill health as well as the provision of safe and healthy workplaces and activities.

Finally, the clause places requirements on top management to assign relevant responsibilities and support other relevant management roles to demonstrate their leadership as it applies to their areas of responsibility.

Clause 5.1 - Leadership and Commitment

The requirements within this clause are generally self-explanatory. You will need to provide information on how top management ensure the OHSMS is compatible with the strategic direction as well as taking responsibility for promoting a safety culture to ensure that the management system achieves its intended outcome(s).

Consideration should be given to how top management ensures the OHSMS management system achieves the intended results.

EVIDENCE/ACTION REQUIRED

Clause 5.2 - Policy

Top management need to establish, implement and maintain an OHSMS policy that includes a commitment to provide safe and healthy working conditions for the prevention of work related injury and ill health and is appropriate to the purpose, size and context of the organisation and to the specific nature of its OHSMS risks and opportunities. The policy must be communicated, set out the framework for establishing measurable occupational health and safety objectives and targets, include a commitment to consultation and participation of workers or representatives and a commitment to eliminate hazards and fulfil legal requirements.

Consideration should be given to when the policy was last reviewed/amended and details of any changes required to meet the requirements of Clause 5.2.

EVIDENCE/ACTION REQUIRED

Clause 5.3 - Organisational Roles, Responsibilities, and Authorities

Top management need to ensure that the responsibilities and authorities for relevant roles are assigned, communicated and understood throughout the organisation. This must be maintained as documented evidence.

Consideration should be given to how top management have established and communicated responsibilities and authorities for the effective operation of the OHSMS and how reporting on the performance of the management system is communicated to top management.

EVIDENCE/ACTION REQUIRED

Clause 5.4 - Consultation and Participation of Workers

The organisation must establish, implement and maintain a process(es) for consultation and participation of workers at all applicable levels and functions, and, where they exist, workers' representatives, to continually improve the OHSMS. Consideration should be given to how the organisation carries out the consultation of non-managerial workers on the required content of Clause 5.4 including the needs and expectations of interested parties.

EVIDENCE/ACTION REQUIRED

NEW CLAUSE 6 – PLANNING

There is an increased focus on ensuring that planning is considered within the context of the organisation and interested parties. There is now a requirement to identify risks and opportunities, and the impact these may have on the OHSMS and how you plan to address these.

Clause 6.1 - Actions to Address Risks and Opportunities

This clause requires you to identify the risks and opportunities that need to be managed. Planning should be proportionate to the level of risk identified and the objectives of the organisation as a whole, taking into account the context of the organisation, including the needs and expectations of relevant interested parties and workers.

Whilst the organisation should consider all potential risks to occupational health and safety performance, it is not necessary to keep detailed documented information for all of them. The focus should be on those hazards which are most likely to occur and/or have the most impact and lead to the most significant risks.

Consideration should be given to how the organisation determines and assesses the risks that can affect occupational health and safety performance and how it manages these risks, including hazard identification, legal requirements and performance assessment.

EVIDENCE/ACTION REQUIRED

Clause 6.2 - Occupational Health and Safety Objectives and Planning to Achieve Them

The organisation must establish occupational health and safety objectives that are linked to the occupational health and safety risks, opportunities and performance criteria which the organisation has identified as having the highest priority. These should be proportionate to the scale, complexity and nature of the organisation.

Consideration should be given to how the organisation ensures occupational health and safety objectives are relevant to the organisation's policy, how they are communicated and how the results are to be evaluated.

EVIDENCE/ACTION REQUIRED

NEW CLAUSE 7 – SUPPORT

You need to have the right support to ensure the OHSMS can function effectively, including the resources, competence, communication, awareness and requirements for documented information to meet your organisational occupational health and safety goals.

Clause 7.1 - Resources

The organisation should decide on the resources needed to achieve occupational health and safety objectives, e.g. money, people, equipment, organisational knowledge and any constraints such as budget, schedule that need to be considered.

Consideration should be given to how internal and external resource requirements are considered for the establishment, implementation and improvement of the OHSMS.

EVIDENCE/ACTION REQUIRED

Clause 7.2 - Competence

You need to determine the competency of people and ensure that these are met and maintained. It is important that both the organisation and individual workers understand what it means to be 'competent' and how this can be achieved and demonstrated.

Consideration should be given to how the organisation ensures that competence requirements are established, and that workers have the relevant competence to carry out their activities in a safe and healthy way.

EVIDENCE/ACTION REQUIRED

Clause 7.3 - Awareness

This clause covers occupational health and safety awareness and workers should also be made aware of relevant hazards and related occupational health and safety risks that can impact them, including those that might not be related to their individual activities.

Consideration should be given to how workers are made aware of the OHSMS management system objectives, policy and occupational health and safety performance and how it affects them and how their own actions can affect it.

EVIDENCE/ACTION REQUIRED

Clause 7.4 - Communication

This clause has now been expanded to include both internal and external communications relevant to the OHSMS. You will need to think about what you need to communicate, when, to whom and how.

Consideration should be given to how this is achieved.

EVIDENCE/ACTION REQUIRED

Clause 7.5 - Documented Information

Clause 7 replaces 'documented procedures and records' from the OHSAS 18001:2007 version with 'documented information'. The new standard refers to documented information being held in different file formats and can be whatever suits the organisation and the task at hand, e.g. electronic spreadsheets, notes on smart phones, photographs, traditional log books or work instructions, online instruction videos. For many organisations, a mix of different types of documented information work well.

Consideration should be given to how the organisation will create, update, control and retain documented information relating to the occupational health and safety management system.

EVIDENCE/ACTION REQUIRED

NEW CLAUSE 8 – OPERATION

This clause provides guidance on the operational planning and control necessary for the OHSMS and includes eliminating hazards and reducing occupational health and safety risks, managing change, emergency preparedness and response as well as requirements regarding outsourcing, procurement and contractors

Clause 8.1 - Operational Planning and Control

Processes needed to meet requirements of the organisation need to be planned, implemented and controlled, as do the actions identified in Clause 6. Requirements relate to the management of change, elimination of hazards and reduction of occupational health and safety risks (hierarchy of control) and the control of procurement.

Consideration should be given to how this is achieved.

EVIDENCE/ACTION REQUIRED

Clause 8.2 - Emergency Preparedness and Response

This clause requires the organisation to establish, implement and maintain a process(es) needed to prepare for and respond to potential emergency situations.

Consideration should be given to how you intend to:

- Establish a planned response to emergency situations, including the provision of first aid
- Provide adequate resources for the provision of training
- Test and evaluate emergency response performance

EVIDENCE/ACTION REQUIRED

NEW CLAUSE 9 – PERFORMANCE EVALUATION

Requirements for monitoring, measurement, analysis and evaluation are covered and you'll need to consider what needs to be measured, methods employed, when data should be analysed and reported on and applicable legal requirements. Documented information that provides evidence of this must now be retained.

Describe how you meet these requirements.

EVIDENCE/ACTION REQUIRED

Clause 9.1 - Monitoring, Measurement, Analysis and Evaluation

You need to determine when monitoring and measurement will be performed and when the results will be analysed and evaluated.

Consideration should be given to how and when the organisation intends to monitor and evaluate the occupational health and safety performance that is determined by the context and the scope of the OHSMS.

EVIDENCE/ACTION REQUIRED

Clause 9.2 - Internal Audit

Additional requirements are now specified relating to defining the 'audit criteria' and ensuring that the results of the audits are reported to "relevant management". However, there is no fundamental change in approach when considering the guidance provided within the clause contents.

Consideration should be given to how your organisation addresses internal audit requirements.

EVIDENCE/ACTION REQUIRED

Clause 9.3 - Management Review

There are now additional requirements including the consideration of changes in external and internal issues that are relevant to the OHSMS.

Consideration should be given to how your organisation addresses these changes.

EVIDENCE/ACTION REQUIRED

NEW CLAUSE 10 – IMPROVEMENT

This clause starts with a new section that organisations should determine and identify opportunities for improvement, such as improved processes, to achieve continual improvement in the long term.

Clause 10.1 - General

This clause covers the general need for improvement and the need to actively look for opportunities for improvement and implement the necessary actions to achieve the intended outcomes of the OHSMS.

Consideration should be given to how the organisation intends to achieve this.

EVIDENCE/ACTION REQUIRED

Clause 10.2 - Incident, Nonconformity and Corrective Action

This clause covers the requirement for establishing processes to investigate incidents, near misses and other non-conformities and provide a corrective action plan. Consideration should be given to how the organisation intends to achieve this.

EVIDENCE/ACTION REQUIRED