

Summary of OHSAS 18001:2007 Requirements

With this article, the 18000 store provides a brief and clear summary of the OHSAS 18001:2007 requirements. First of all, OHSAS 18001 is an international standard that describes the requirements for an occupational health and safety management system (OHSMS) and secondly, the whole of the requirements are outlined in section 4 of the standard.

The following paragraphs, identified to coincide with the OHSAS 18001:2007 numbering system, provide a clause-by-clause summary of the standard.

4.0 OH&S Management System Requirements

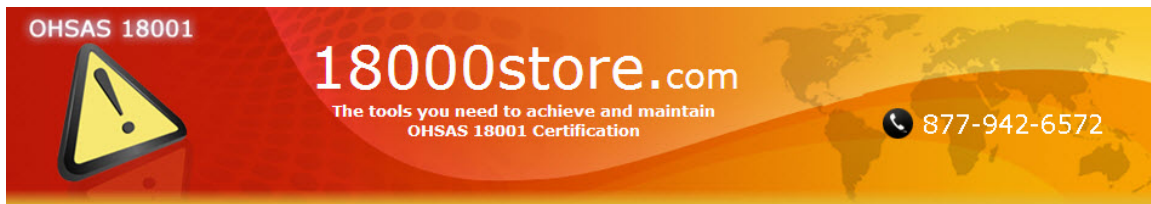
4.1 General Requirements

The first clause of OHSAS 18001:2007 standard requires that a company (i.e. a business, a corporation, an enterprise, an organization), establish, document, implement, and continually improve their occupational health and safety management system and demonstrate that they meet all the requirements of the standard. Top management in the company starts the process by defining the scope of the management system; that is, identify the boundaries to which the OHSMS applies. This will take into account the company's activities relative to products, services, departments, facilities, or multiple plant locations.

4.2 OH&S Policy

The next clause of the standard requires that an occupational health and safety policy developed and approved by top management and relating to the scope of the OHSMS be formulated and in place. This is usually a short statement that sets the stage for the remaining components of the OHSMS and provides the framework for the review of health and safety programs with defined objectives and targets. There are some specific items that must be addressed in the policy, and they deal with compliance with legal and other requirements, prevention of injury, prevention of ill health, reduction of hazards and continual improvement.

In addition, the policy needs to be communicated to all employees, to other people working on behalf of the company, and be available to interested parties. The policy must be documented, implemented, and maintained and this means that it is kept up to date and validated through the management reviews and supported by the whole of the OHSMS.



4.3 Planning

4.3.1 Hazard Identification, Risk Assessment and Determining Controls

This sub-clause requires a procedure to identify workplace hazards, assess the risks associated with them and determine the controls that the company can implement to mitigate the effects of the identified significant risks. The OHSAS 18001 standard does not prescribe what hazards or risks should be significant, or how to determine their significance. This is left for the company to decide, but it is expected that a consistent risk analysis process will be used to determine the significance of the impacts the risks will have.

The relationship between health and safety hazard and health and safety impacts is one of cause and effect. A health and safety hazard refers to an element of the company's activities, operations, products or services, which can have a potential adverse impact on health and safety. A health and safety impact refers to the change, which takes place as a result of the hazard, its risk and controls.

The intent of this requirement is to help the company identify how it affects the workplace health and safety, identify the hazards, set priorities for them, and use the OHSMS to manage, control, and improve upon the impacts. It is important for the company to ensure that the significant hazards and risks are taken into account in the OHSMS and the relevant information kept up to date so that the system can be continually improved.

4.3.2 Legal and Other Requirements

There is a requirement for a procedure to explain how the company obtains information regarding its legal and other requirements, and makes that information known to relevant functions within the company.

The intent of this sub-clause is to identify the legal and other requirements that pertain to its operations and activities so that the company can ensure that they are incorporated in the OHSMS. With the identification of the legal and other requirements, the company must determine if these requirements have health and safety consequences.

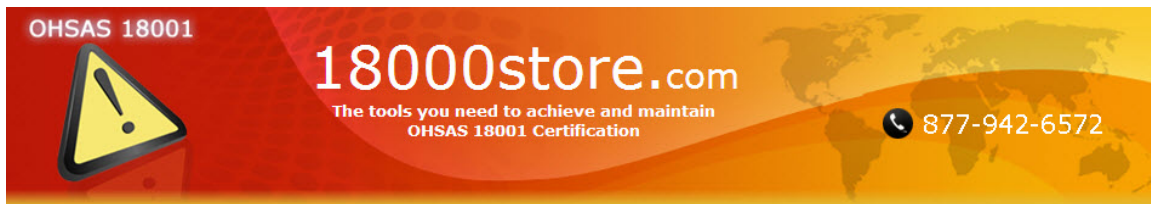
It follows that high significance impacts identified (with the above 4.3.1 and 4.3.2) become candidates for health and safety programs (4.3.3 below) and health and safety programs are candidates for operational controls (4.4.6 below).

4.3.3 Objectives and Programs

In this sub-clause, there is a requirement for a system that ensures that health and safety programs with objectives and targets are consistent with the policy, which includes the commitments to compliance with legal and other requirements, continual improvement, and prevention of injury and ill health.

In addition, the company must take into consideration significant hazards, legal and other requirements, views of interested parties, and technological, financial, and business issues when deciding what it wants to accomplish as an objective. The objectives and targets can be very different and specific for each company and need to exist at whatever functions and levels of the company, and where practical be measurable.

Health and safety programs are required in an OHSMS and become the plans and programs detailing how the objectives and targets will be accomplished. Typically, they identify the responsible personnel, benchmarks, milestones and dates, and measurements of success. When measuring and monitoring parameters are included in the programs, conformance to the performance measuring and monitoring sub-clause 4.5.1 (below) becomes practical.



4.4 Implementation and Operation

4.4.1 Resources, Roles, Responsibility, Accountability and Authority

The OHSAS 18001 standard requires that the top management be accountable and take the ultimate responsibility for OH&S and the OHSMS. This sub-clause requires top management to demonstrate its commitment by ensuring that resources are available so that the OHSMS can be implemented, maintained, and improved. Resources include human resources, infrastructure, financial, technological resources, and others as needed.

Roles, responsibilities, accountability and authorities must be defined, documented and communicated at the relevant levels and functions. An organization chart becomes an effective tool to demonstrate the responsibility and authority structure within the company.

The company must appoint a member of top management as the management representative who becomes the OHS project manager who is responsible to report to management on its implementation progress. This person ensures that the OHSMS is established, implemented and maintained consistent with OHSAS 18001, and reports to top management on the performance of the system including recommendations for improvement.

4.4.2 Competence, Training, and Awareness

The primary requirement of this sub-clause is to ensure that persons performing tasks that have or can impact on health and safety and/or relate to the legal and other requirements are competent and able to do the tasks. Competence is ensured through appropriate education, training, and/or experience. The company needs to identify training needs as they relate to the OHSMS, the risks associated with the significant hazards and the legal and other requirements and make sure this training is provided and records maintained.

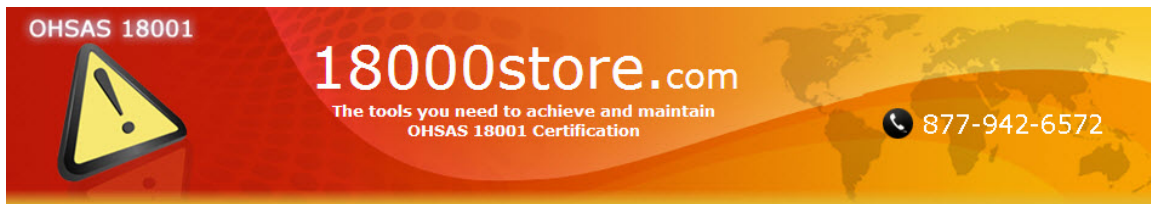
A procedure is needed to make sure such persons are aware of the need to conform to all OHSMS procedures and requirements and know what they specifically need to do. Employees must be aware of the OH&S risks and the legal and other requirements associated with their respective responsibilities, why improved performance is beneficial, and what the consequences of not following procedures and requirements are.

In addition to job-specific expertise and knowledge, it is expected that all personnel within the OHSMS (including contractors and visitors) have general awareness on items such as the OH&S policy and emergency response.

4.4.3 Communication, Participation and consultation

This sub-clause of the standard requires procedures covering both internal and external communications. For internal communications, the procedure needs to describe how communication among the levels of the company is accomplished. For external communications, the procedure has to describe how external communications are received, documented, and responses provided.

There is a specific requirement for the company to establish, implement and maintain a procedure for the participation of workers and consultation with external contractors and relevant external interested parties.



4.4.4 Documentation

This requirement ensures that the company has documented the system (in either electronic or paper form) that addresses the clauses of the standard, describes how the company conforms to each clause and sub-clause, and provides direction to related documentation.

For this requirement, not all the OHSMS required activities need to be documented in procedures, as long as the system requirements can be verified. However, documentation must be provided such that enough is available to ensure the effective planning, operation, and control of processes related to the significant risks associated with identified hazards, and to demonstrate conformance to OHSAS 18001. At a minimum, such documentation includes the OH&S policy, objectives and programs, a definition of the scope of the OHSMS, and other elements that are specific or unique to the company.

4.4.5 Control of Documents

The company is required to control documents, so that the latest versions of the OHSMS manual with its system procedures and work instructions are distributed and obsolete information removed from the system. In this sub-clause, there is a requirement for a document control procedure that ensures documents are approved prior to use, are reviewed and updated as necessary, changes to versions are identified, and that the current versions are available at points of use. Documents need to be legible, identifiable, and obsolete ones so identified as to avoid unintended use. Other documents of internal origin can be used in the OHSMS, but they must be identified as being essential to the OHSMS and their distribution controlled.

4.4.6 Operational Control

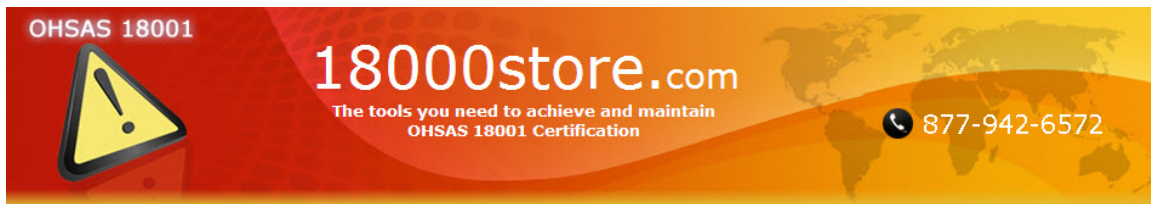
For this requirement, critical functions related to the policy, significant health and safety hazards, the legal and other requirements, and objectives and programs are identified. Procedures and work instructions are required to ensure proper execution of activities. This sub-clause includes communicating applicable system requirements to contractors who are involved on behalf of the company.

The required procedures and instructions need to provide sufficient details so that the company can conform to the policy, the health and safety objectives, targets, programs, the legal and other requirements, and address any impacts from significant hazards. The need for these can be determined with the review of the health and safety risks, objectives, targets, programs, the legal and other requirements, and policy and then deciding what must be documented as a procedure to ensure that deviations from planned arrangements do not occur.

In addition, the company will need to establish procedures related to the significant hazards and the legal and other requirements for the goods and services it uses, and communicating the relevant elements of those procedures to the suppliers and contractors.

4.4.7 Emergency Preparedness and Response

Although, this sub-clause can typically be addressed through conventional emergency response plans, it also requires that a process exist for actually identifying the potential emergencies, in addition to planning and mitigating them. Emergency incidents include those that may not be regulated, but may still cause significant impact as defined by the company. As part of continual improvement, it is required that the company not only respond to emergency situations, but also reviews the emergency procedures and make improvements as necessary. This may involve periodic testing of emergency procedures, such as with a mock-drill, if practicable.



4.5 Checking

4.5.1 Performance Measurement and Monitoring

To properly manage the OHSMS, monitoring must be done and measurements taken to determine how the system is performing. Data generated from this activity can be analyzed and improvement action identified. For this sub-clause, procedures are required to describe how the company will monitor and measure key parameters of the operations. These parameters relate to the operations that can have significant impacts, to monitor performance towards the objectives and programs, and to monitor conformance to the legal and other requirements and other OHSMS requirements.

In addition, equipment and measuring devices related to health and safety measurements must be calibrated according to procedures, and records maintained.

4.5.2 Evaluation of Compliance

The first part of this sub-clause requires the company to have a procedure to periodically evaluate its compliance with applicable legal requirements as previously defined per paragraph 4.3.2. The company will need to keep records of these periodic evaluations.

The second part of this sub-clause similarly requires an evaluation for compliance with other requirements and a procedure to evaluate compliance can include both legal requirements and other requirements.

4.5.3 Incident Investigation, Non-conformity, Corrective and Preventive Action

This sub-clause requires procedures to record investigate and analyze incidents in order to determine underlying OH&S deficiencies and for taking action on non-conformances identified in the system, and including corrective and preventive action. A non-conformance occurs when the actual condition is not in accordance with planned conditions. For example, someone not following a procedure, a regulatory non-compliance, or a misused protective device, are all possible system non-conformances.

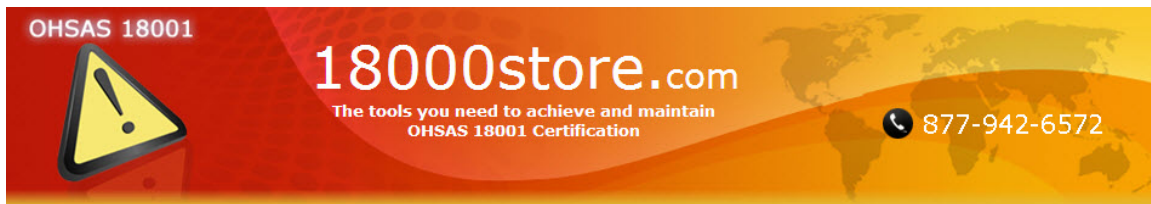
Non-conformances may be identified through audits, monitoring and measurement, and other communications. The company is required to correct the system flaws by addressing root causes, rather than only fixing the immediate problem. The standard also requires that trends in corrective actions be evaluated to see if preventive actions can also be implemented.

The procedure needs to make sure the non-conformances are not only first addressed to mitigate health and safety impacts, but that further investigation occurs to determine their cause, and action taken to avoid it happening again. Preventive actions would then be those actions resulting from an evaluation as to why nonconformities are occurring and taking action to prevent their recurrence. This sub-clause also states that the corrective action be appropriate to the magnitude of the problem and the impacts encountered; to avoid either over-compensating or under-compensating for a problem.

The company must record the results of corrective actions taken, and must also review the effectiveness of actions taken.

4.5.4 Control of Records

Records are expected to be generated to provide the objective evidence and to serve as verification that the system is functioning and that the company is in conformance to the standard and to its own OHSMS requirements. A procedure for this sub-clause is required for the maintenance of records, and specifically requires that records be identifiable, retrievable, safely stored, legible, traceable, and retained as appropriate.



4.5.5 Internal Audit

The OHSAS 18001 standard requires that internal audits be carried out. This sub-clause requires a procedure that includes the methods, schedules, checklists and forms, and processes used to conduct the audits. The purpose of the internal audit is to determine whether the system conforms to the requirements of OHSAS 18001 and the company's own OHSMS detailed requirements. It also serves to determine if the OHSMS has been properly implemented and maintained.

The procedure for internal audits has to address responsibilities and requirements for planning and executing the audits, reporting results, and what records will be generated and maintained. The procedures also address determination of audit scope, how often they will be conducted, and specifically how they will be done. Auditors need to be selected and trained so that objectivity and impartiality of the audit process are assured.

4.6 Management Review

The last clause of OHSAS 18001:2007 requires that, at planned intervals, top management reviews the OHSMS to ensure it is operating and functioning as planned, and is suitable, adequate, and effective. The company needs to ensure that the inputs for management reviews include results of internal audits, evaluation of compliance with legal and other requirements, results of participation and consultation, relevant communications from external interested parties, OH&S performance, extent to which objectives and targets are met, status of incident investigations, status of corrective and preventive actions, follow up on actions from prior management reviews, changing conditions or situations, and recommendations for improvement. Results and records become the outputs of management review and can include meeting agendas, attendance records, summary of the discussions and decisions taken, and made available for communication and consultation.