

MANAGING OCCUPATIONAL HEALTH AND SAFETY WITH BS OHSAS 18001

An short article by Dr Tony Boyle of HASTAM

Introduction

BS OHSAS 18001¹ is an Occupational Health and Safety Management System (OH&SMS) published by the British Standards Institution (BSI) and it is an alternative to the other main OH&SMS used in the UK, that is, the Health and Safety Executive's (HSE's) *Successful Health and Safety Management*² (HSG65).

This article describes how using BS OHSAS 18001 to manage OH&S produces very different results from using HSG65. The article is based on two main sources of information:

The results of HASTAM's work in a number of organisations, in a wide variety of sectors, both public and private.

HASTAM's expert witness work on cases including the Port Talbot, Buncefield and Biolab explosions and the Potters Bar derailment.

The article begins with a description of our findings with regard to the way OH&S is typically being managed and continues with a description of some key issues identified and addressed.

Existing OH&S management

In the majority of the organisations we have been involved with, OH&S was being managed using a combination of OH&S legislation and HSG65. This created the following problems.

Complying with OH&S legislation does not produce good OH&S management because, except in special situations such as railways, offshore installations and major accident hazard industries there is no legal requirement for key management activities such as planning, monitoring, measuring, audit and review³. Indeed, there is no legal requirement to investigate the majority of accidents and the legal requirement to record accidents is social security legislation, not OH&S legislation.

¹ BSi, 2007, Occupational health and safety management systems - Specification

² HSE, 1997, Successful Health and Safety Management, HSG65. At the time of writing HSG65 was being revised by the HSE. We will publish our comments on the new document when we have had the opportunity to review it.

³ Regulation 5 of the Management of Health and Safety at Work Regulations 1999 requires activities of this type but only in so far as they relate to "preventive and protective measures".

HSG65 is guidance, it is not a specification. This means that organisation can claim to be complying with HG65 even when they are not carrying out many of the activities described in HSG65. For example, none of the organisations we have been involved with had a planning procedure, an effective measuring procedure, an internal audit procedure or a management review procedure despite the fact that all of these activities appear in the HSG65 diagram. Incidentally, all of the organisations claimed to be on the second edition of HSG65, which is based on the concepts of workplace precautions and Risk Control Systems, but none of the OH&S professionals concerned knew what these terms meant.

In addition, the organisations' documentation had the following main flaws.

It was described as the OH&S Policy, but was between 80 and 300 pages long. In environmental and quality management systems the policy is one or two pages long and the excessive length of the OH&S Policies arises because of a misreading of the Health and Safety at Work etc. Act 1974⁴. What the OH&S professionals referred to as their OH&S Policies were akin to an OH&S Manual and this is how they are described from now on.

The OH&S Manuals consist mainly of paraphrased HSE Guidance (with a random selection of transcription and interpretation errors) on a range of OH&S legislation, for example, the risk assessment requirements from the Management of Health and Safety at Work Regulations 1999, or control of specific risks such as substances hazardous to health, display screen equipment and manual handling. The vast majority of the documentation described how to do things and there were few, if any, descriptions of who should do things, when and with what result.

There was no particular structure to the documentation and no consistency from one section to another. Usually, different sections had been written by different people at different times (typically soon after new legislation had been enacted) and few of the organisations had document control procedures which specified document formats.

⁴ The relevant section of the Health and Safety at Work etc. Act is "it shall be the duty of every employer to prepare and as often as may be appropriate revise a written statement of his general policy with respect to the health and safety at work of his employees and the organisation and arrangements for the time being in force for carrying out that policy".

For some reason this has been misinterpreted by the OH&S community in general and even the current (August 2004) edition of the National Examination Board in Occupational Safety and Health's Diploma syllabus includes the following.

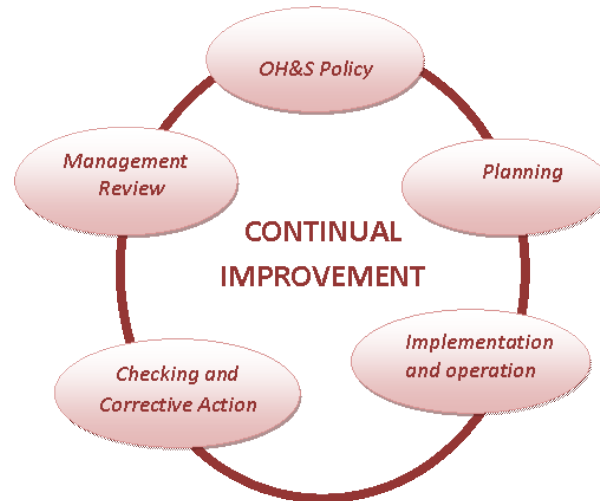
"Description of the general components of a health and safety policy document:

- statement of intent – overview, safety goals and objectives
- organisation – duties, responsibilities and organisational structure in relation to health and safety
- arrangements – systems, procedures, standards, cross-reference to key documents."

It is not clear how this misinterpretation came about, but so long as examination boards continue to say that this is what should be taught, the misinterpretation is likely to continue.

In general, the content of the documentation suggested that it had been written by looking at OH&S legislation rather than looking at what an organisation did, what management systems it already had in place, and what it wanted to achieve with its health and safety management.

Structure of 18001 BS OHSAS 18001



Key issues

This section of the article describes a selection of the key issues identified and addressed during the work. The section is subdivided as follows.

- Description of the OH&SMS
- Behavioural based documentation
- Top management involvement
- Legal requirements
- Measuring OH&S performance
- Audit

Description of the OH&MS

BS OHSAS 18001 requires the following. A

“description of the main elements of the OH&S management system and their interaction, and reference to related documents”.

In practice this means that OH&S professionals have to decide what they want their organisation to do with regard to all of the procedures identified in BS OHSAS 18001. They then have to write this down, either in the description or as separate procedures. Once they are clear about what they would like to see happen, they have to obtain the relevant authorisation, usually from top management, and this is dealt with in a later section.

The typical findings from this part of our work are that OH&S professionals have not thought about OH&S management in this way before. They have thought about compliance with the requirements of legislation, but not about conformity with the requirements of an OH&SMS. However, they all saw the benefits of managing OH&S more systematically and either prepared or procured appropriate descriptions of their intended OH&SMS.

Behavioural based documentation

Behavioural based documentation is used as shorthand for documentation which contains descriptions of what people will do, when and with what result. This type of documentation is also referred to as standards based documentation.

Preparing this type of documentation requires OH&S professionals to be clear about what they want other people to do and record it in the form

Job Title or Name will (for example) carry out risk assessment reviews annually and make any changes identified as necessary.

This is in contrast to more commonly used forms such as

Risk assessment reviews will be carried out annually.

The organisation will carry out risk assessment reviews.

The critical aim of behavioural based documentation is to ensure that every required OH&S task is clearly allocated to a specified job title or a named individual since this is an essential prerequisite of effective allocation of responsibility and accountability.

The behavioural based documentation developed for and by the organisations, in addition to specifying, usually for the first time, who should do what, enabled two other major improvements.

- 1 It was structured according to the requirements of ISO/TR 10013⁵ so that consistency between documents could be ensured.
- 2 It was linked to the Description of the OH&MS so that a structure was imposed on the complete documentation and particular information was easier to find.

Top management involvement

Two of the requirements of BS OHSAS 18001 are dealt with in this section.

- 1 The requirement for a management appointee.
- 2 The requirement for top management reviews.

⁵ BSi, 2001, Guidelines for quality management system documentation, ISO/TR 10013. Although the title of this document refers only to quality documentation the text includes "This Technical Report may be used to document management systems other than the ISO 9000 family, for example environmental management systems and safety management systems".

Management appointee

BS OHSAS 18001 requires that a member of top management is appointed “with specific responsibility for OH&S, irrespective of other responsibilities” and this management appointee has to have a defined role, responsibility and authority for a range of tasks.

In conformity with the use of behavioural based documentation, the tasks the management appointee has to carry out have to be identified and recorded and it is also good idea to estimate how long they will take since this is likely to be one of the first questions any proposed management appointee will ask.

It is essential that there is a management appointee, not only to satisfy the requirements of BS OHSAS 18001 but also because the management appointee is the person who will be able to authorise the other OH&S responsibilities and accountabilities identified in the behavioural based documentation. The management appointee also has an important role in the management review which is the subject of the next section.

Management review

BS OHSAS 18001 requires that the “Top management shall review the organisation’s OH&S management system, at planned intervals, to ensure its continuing suitability, adequacy and effectiveness”.

Management reviews are critical for two reasons.

1. They close the feedback loop. In any system like an OH&SMS, control is only possible if there is a feedback loop. In essence, the output of the system is measured and the level of the output used to determine what the system does next. In an OH&SMS, the feedback loop is created by the actions of people during the review process and if these actions are not carried out the OH&SMS is out of control. Because the OH&SMS is complex, it is difficult to predict the consequences of this lack of control but experience from major disasters has shown that they can be very severe.
2. They drive continual improvement. If an organisation is to maintain an effective and efficient OH&SMS and meet the requirements of BS OHSAS 18001 it must have a procedure for continual improvement. As a minimum, this procedure should ensure that the OH&SMS adapts to meet internal and external changes and so stays “up to date”. However, BS OHSAS 18001 requires that organisations go beyond this and create absolute improvements.

However, few of the organisations involved had a formal management review procedure. When the idea of a management review procedure was described to the top management of the organisations it was accepted in all the organisation. Top managers seemed pleased that they were receiving practical guidance on what they had to do to manage OH&S, rather than threats of gaol if they did not meet their responsibilities.

As with the other BS OHSAS 18001 procedures, the management review procedure should be documented.

Legal requirements

BS OHSAS 18001 requires that the “organization shall establish, implement and maintain a procedure(s) for identifying and accessing the legal and other OH&S requirements that are applicable to it” and the “organization shall keep this information up-to-date”.

All of the organisations had a policy commitment to complying with relevant OH&S legislation, but none of them had a list of the legislation with which they had to comply and none of them had a formal procedure for identifying and accessing new or changed legislation. Setting up and maintaining a list of relevant OH&S legislation (often referred to as a Legal Register) is an onerous task and a number of organisations opted for HASTAM’s Legal Register service which maintains an up to date Legal Register on their behalf.

Measuring OH&S performance

All of the organisations measured loss data to some degree but there was no measurement of, for example, compliance with legislation or conformity with the organisation’s OH&SMS.

Measurement of loss data was easily improved by, for example, using number of days lost instead of just number of incidents, and by making estimates of accident costs. In one organisation, a quick estimate of accident costs using a specially developed spreadsheet showed the costs in the previous year were equivalent to the organisation’s deficit for that year.

Measurement of compliance with OH&S legislation was also easy to deal with by using HASTAM’s monitoring, auditing and measuring software packages.

Measuring conformity with the organisation’s OH&SMS was more difficult, for two reasons.

- 1 As has been described, the organisations’ existing documentation was not based on standards and was not, therefore, suitable for measuring conformity. It will be some time before all of the new documentation is implemented fully and amenable to conformity measurement.
- 2 The requirements of the new documentation have to be translated into question sets so that they are in a form which will enable measurement. This is an ongoing process but, as continual improvement is central to BS OHSAS 18001, it provides ways in which improvement can be achieved – more and better measurement of the performance of the OH&SMS.

Internal audit

In most of the organisations, inspections were referred to as audits and in none of the organisations was there OH&SMS auditing. All but one of the organisations had as an objective achieving or maintaining external accreditation to BS OHSAS 18001 and this means that they will be or were subject to external management system audits. These external audits are conducted according to the requirements of ISO 19011⁶ and for this reason it was necessary that the OH&S professionals learned these requirements. This was done either with an in-house course, for those organisations with a number of OH&S professionals, or attendance at an appropriate public course.

⁶ BSi, 2011, BS EN ISO 19011, *Guidelines for auditing management systems*.

Conclusion

Managing OH&S by complying with BS OHSAS 18001 takes OH&S professionals into areas not normally dealt with in OH&S training. This makes it challenging, but also a rich source of Continuing Professional Development activities. However, the benefits to the OH&S professionals are far outweighed by the benefits to the OH&S professionals' organisations which, if BS OHSAS 18001 is implemented effectively, will have an OH&SMS which is the equal of the equivalent management systems for quality and environment. This will enable OH&S management to join quality and environmental management in being driven by the requirements of the organisation, rather than by legislation.

OHSAS 18001 implementation

COMPREHENSIVE SUPPORT TO SET UP YOUR MANAGEMENT SYSTEM FROM HASTAM

- Undertake the essential Initial Status Review.
- Prepare in partnership with you your OHSAS 18001 documentation using time saving templates.
- Create Information System based document control and compliance monitoring.
- Ensure the competence of those managing the system.