



## WHAT YOU NEED TO KNOW ABOUT **MIGRATING TO ISO 45001**

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The adoption of a standard to improve an occupational health and safety management system is undertaken for a number of important reasons:

- To reduce work related injuries, ill health and fatalities.
- Eliminate or minimise occupational health and safety risks.
- Inform, consult with and motivate workers to improve safety performance.
- Demonstrate management commitment and promote corporate responsibility.
- Improve and develop brand reputation.

Organisations have adopted management system standards of various types for many years now and it would be fair to say that the majority have been focused upon what we could call, the '3 sister' management system standards, that of occupational health and safety, environment and quality.



Environmental and quality management have been within the remit of ISO (International Standards Organisation) in recent times whereas occupational health and safety management system models existed outside of ISO such as the ILO-OHS 2001 model or BS 8800. Although these OHS standards provide a framework for developing and implementing a management system, they were not specifically designed to be audited and certifiable and also not specifically developed to seamlessly integrate with other management systems.

OHSAS 18001:2007 – Occupational Health and Safety Management Systems - Requirements, of which the 2007 iteration is to be the last, was developed back in 1999 by a group called the Occupational Health and Safety Advisory Services (OHSAS) project group although it was never adopted as an official ISO standard.

The formation of this group was initiated by the UK based registrar BSI Management Systems who were a sister organisation to British Standards who themselves promoted the OHSMS standard BS 8800 that was never approved and adopted as an ISO standard. They collaborated with other international registrars and worldwide occupational health and safety experts to develop a standard that would meet the requirements of an auditable ISO OHSMS model and the OHSAS 18001:1999 standard issue was the result although ISO themselves were not involved in its development.

There were two goals for developing this standard:

1. To develop an occupational health and safety (OHS) standard that would be compatible with the increasingly successful ISO 14001:1996 and ISO 9001:2000 environment and quality management standards.
2. To develop an auditable OHS management system standard due to the rejection of the British Standard BS 8800 by ISO, which had been developed as a guidance document for developing an OHS management system framework but it had not been designed as an auditable model.

The OHSAS 18001:2007 standard actually defines its close relationship with ISO as it states [1] "This OHSAS standard has been drafted in accordance with the rules given in the ISO/IEC Directives, Part 2." and "This OHSAS standard will be withdrawn on publication of its contents in, or as, an international Standard." and there was also recognition that 18001 would need to keep pace with any ongoing development of ISO standards, principally 14001 and 9001.

The standard guidance document ISO 18002:2008 itself states, "OHSAS 18001 now refers to itself as a standard, not a specification, or document, as in the earlier edition. This reflects the increasing adoption of OHSAS 18001 as the basis for national standards on occupational health and safety management systems." It was almost inevitable that an agreed OHS standard was going to be developed and it is ISO 45001 that will fulfill this role.



The reason why the new standard does not take over the very familiar 18001 numbering convention used by OHSAS is that ISO have already allocated that number series to information technology standards, specifically ISO/IEC TR 18001:2004 - Information technology -Radio frequency identification for item management -- Application requirements profiles. Once the new standard is published, the OHSAS 18001 standard will be formally withdrawn and a three-year transition period will begin for organisations that wish to migrate to the new standard.

## THE DEVELOPMENT OF ISO 45001

At this time, this new standard is continuing to go through the prescribed standard review and appraisal consultation phases and to date has been in this process since March 2013 when it was proposed. The development of the ISO 45001 standard has followed these steps:

| Date          | Phase  |
|---------------|--|
| March 2013    | Proposal stage   |
| November 2013 | Preparatory stage  |
| March 2015    | CD – Committee stage   |
| July 2015     | CD – 2nd Committee stage   |
| November 2015 | DIS – Draft International Standard Enquiry stage   |
| May 2017      | DIS - Draft International Standard 2nd Enquiry stage   |
| November 2017 | FDIS – Final Draft International Standard Approval stage - scheduled to end 25th, January 2018 |
| March 2018    | Anticipated publication  |



## WHAT ISO 45001 WILL BE & WHAT IT IS NOT

For users migrating from OHSAS 18001 to the new standard and for those considering taking the new standard for the first time, it is important to understand what the new standard is and is not.

The new standard takes on board the basic premise that its implementation is designed to improve occupational health and safety performance and therefore ISO 45001 has been designed to:

- Be used by organisations of all types and sizes.
- Provide a context for processes that take into consideration the effective management of risk, opportunities, legal compliance and any other conformance requirements.
- Identify and determine hazards and risks and implementing appropriate controls to manage these.
- Establish operational controls to manage identified OHS risk.
- Increasing awareness of OHS risk and involving workers in OHS matters.
- The evaluation of an organisations OHS performance and driving the continual improvement process by taking appropriate actions.
- Improve the involvement of the organisations leadership team.
- Put the emphasis on proactive rather than reactive risk management.
- Follow the PLAN-DO-CHECK-ACT workflow philosophy.
- Improve alignment with other standards, which are or will be based upon the ISO Annex SL framework.

ISO 45001 has not been designed to:

- Describe or detail expected OHS performance standards, levels or criteria.
- Replace legal requirements placed upon an organisation.
- The standard is not a legally binding document.
- The standard does not describe “product safety, property damage or environmental impacts, and an organization is not required to take account of these issues unless they present a risk to its workers.”<sup>2</sup>

## CHANGES FROM OHSAS 18001 TO ISO 45001

The adoption of a new standard has presented an opportunity to incorporate learnings from the use of previous iterations, review the compatibility of a standard with others as they also evolve and to capture new thinking on how standards can be adopted by organisations in their drive to improve OHS performance. The new ISO 45001 standard has been developed with all of these elements taken into consideration.

One significant change that has been adopted to cover all future standards is what is known as the Annex SL or the new ISO high-level structure (HLS). The British Standards Institution describes this as the “framework for a generic management system and the blueprint for all new and revised management system standards going forward.”<sup>3</sup>

This is a term used to describe how standards are to be structured so whilst many standards shared common ISO elements such as standard scope, terms and definitions, operations and so on the structures of some standards differed and these elements could appear in different parts of the standard with different clause numbers.

For an organisation adopting a single standard, this is not so much of an issue but with integrated management systems, that can incorporate four of five different standards, compatibility across these different standard clauses can be very problematic and often requires a separate document to show how these diverse standards are mapped within an IMS. This can be a significant issue when each standard needs to be certified individually.

The new Annex SL requirement has the following basic framework:

### ISO ANNEX SL FRAMEWORK

#### **Clause 1 - SCOPE**

#### **Clause 2 - NORMATIVE REFERENCES**

#### **Clause 3 - TERMS AND DEFINITIONS**

#### **Clause 4 - CONTEXT OF THE ORGANISATION**

#### **Clause 5 - LEADERSHIP**

#### **Clause 6 - PLANNING**

#### **Clause 7 - SUPPORT**

#### **Clause 8 - OPERATION**

#### **Clause 9 - PERFORMANCE EVALUATION**

#### **Clause 10 - IMPROVEMENT**

Of course, some industries may need to add sections into this model within their own IMS where there is a requirement.

The 5th iteration of the ISO 9001 quality management system standard published in 2015 (ISO 9001:2015) and the 3rd iteration of ISO 14001 environmental management standard also published in 2015 (ISO 14001:2015) are recent examples where revised standards have been written to conform to the Annex SL framework.

They also have slightly different sub-clauses under their main headings; for example ISO 9001:2015 in Clause 8 – Operations has seven sub-clauses whereas ISO 14001:2015 has only two which shows that the Annex SL model is flexible and can accommodate different elements as required by the particular standard.

The adoption of Annex SL framework will also apply to Publicly Available Specifications (PAS) and Technical Specifications (TS) as well as standards.

Within the 10 main clauses as per the Annex SL framework there are some subtle but important differences that need to be noted between the requirements of OHSAS 18001 and new standards including ISO 45001 (as was defined in the enquiry stage document ISO/DIS 45001):

- The context of an organisation needs to be defined for new standards as per clause 4. Context relates to the reasons why the organisation exists in terms of its business case, its relationship with internal and external stakeholders, the scope and scale of its operations and the boundaries of the implemented management system(s).
- There is a stronger emphasis on leadership including the promotion of a safety culture, demonstrating leadership and to management commitment.
- The terms *documents*, *documentation* and *records* have been replaced by the single term *documented information*.
- There are additional requirements regarding worker involvement and consultation
- The terms *risks and opportunities* are now strongly associated with each other. Although *risks and opportunities* have been within the ISO 14001 standard for some time, OHSAS 18001 never addressed risks and opportunities together. Opportunities are defined as potential beneficial effects.



Under Annex SL, the main clauses that have restructured sub-clauses are listed below:

| Clause #  | Clause Element              | Sub Clauses  |
|-----------|-----------------------------|--|
| Clause 4  | Context of the Organisation | 4.1 Understanding the organization and its context<br>4.2 Understanding the needs and expectations of interested parties<br>4.3 Determining the scope of the managements system<br>4.4 The management system |
| Clause 5  | Leadership                  | 5.1 Leadership and commitment<br>5.2 Policy<br>5.3 Organizational roles, responsibilities and authorities  |
| Clause 6  | Planning                    | 6.1 Actions to address risks and opportunities<br>6.2 Management system objectives and planning to achieve them  |
| Clause 7  | Support                     | 7.1 Resources<br>7.2 Competence<br>7.3 Awareness<br>7.4 Communication<br>7.5 Documented information  |
| Clause 8  | Operation                   | 8.1 Operational planning and control   |
| Clause 9  | Performance Evaluation      | 9.1 Monitoring, measurement, analysis and evaluation<br>9.2 Internal audit<br>9.3 Management review  |
| Clause 10 | Improvement                 | 10.1 Non-conformity and corrective action<br>10.2 Continual improvement  |



Context is important when considering what arrangements will be required when upgrading from OHSAS 18001 to the new ISO 45001 standard, including the scale and scope of works, the use of other standards (such as quality, environment, security, energy etc.) and the complexity of the overall management system structure. I have audited large industrial organisations who have based the clause numbering of their OHS management system on the OHSAS numbering which is not a recommended practice because of the almost certain requirement to change into the future but with the roll-out of Annex SL framework, this idea to number the OHS MS or IMS in this way may now start to make sense. There are a number of key elements that will assist any organisation in the smooth transition between the current OHSAS 18001:2004 standard and the new ISO 45001 standard. These are:

1. Consult with the organisation that is dealing with your standard accreditation to get the latest information on how they intend to rollout accreditation to the new standard and also provide information to them on the timelines that suit you depending on the date of your existing 18001 accreditation.
2. Once the standard has been published, there will be an opportunity to undertake ISO 45001 familiarisation training for both your internal and lead auditors. In addition, even for employees with no specific roles in the assessment of standards, it is important that all members of the workforce are made aware of changes to the safety management

system, especially where an organisation may restructure their safety management system documentation or their integrated management system (an integrated management system incorporates two or more management systems into a single entity) to capture the Annex SL framework.

3. Understand how the transition will be effectively managed by taking the following into account:
  - a. Organise an internal team to manage the transition period.
  - b. Conduct a gap analysis between your existing arrangements and the new requirements of ISO 45001.
  - c. Where gaps or conflicts have been identified, develop an improvement plan and manage remedial actions within the existing management system procedures.
  - d. Prepare for changes in documentation as the new standard is adopted and integrated.

## MAPPING BETWEEN ISO/DIS 45001 ACROSS TO OHSAS 18001:2007

Due to the differences between the new ISO 45001 standard and OHSAS 18001, the following table has been included to give guidance as to where new ISO 45001 requirements map across to OHSAS 18001:2007. It should be noted that this is not the completed standard but is referenced from ISO/DIS 45001, which was a draft international standard document in the standard review process.

| ISO/DIS 45001 Clauses  | OHSAS 18001:2007 Clauses   |
|--|--|
| <b>1 - Scope</b>   | 1 - Scope  |
| <b>2 - Normative references</b>  | 2 - Reference publications   |
| <b>3 - Terms and definitions</b>   | 3 - Terms and definitions  |
| <b>4 - Context of the organisation</b>   |  |
| 4.1 - Understanding the organisation and its context                                   |  |
| 4.2 - Understanding the needs and expectations of workers and other interested parties |  |
| 4.3 - Determining the scope of the OH&S management system                              | 4 - OH&S management system requirements (title only)                   |
| 4.4 - OH&S management system   | 4.1 - General requirements   |
| <b>5 - Leadership and worker participation</b>   |  |
| 5.1 - Leadership and commitment  |  |
| 5.2 - OH&S policy  | 4.2 - OH&S policy  |
| 5.3 - Organisational roles, responsibilities, accountabilities and authorities         | 4.4.1 - Resources, roles, responsibility, accountability and authority |
| 5.4 - Participation and consultation   | 4.4.3.2 - Participation and consultation                               |
| <b>6 - Planning</b>  | 4.3 Planning (title only)  |
| <b>6.1 - Actions to address risks and opportunities (title only)</b>                   |  |
| 6.1.1 - General  |  |

| ISO/DIS 45001 Clauses  | OHSAS 18001:2007 Clauses  |
|--|---|
| <b>6.1.2 - Hazard identification and assessment of OH&amp;S risks (title only)</b> | 4.3.1 Hazard identification, risk assessment and determining controls   |
| 6.1.2.1 - Hazard identification  |   |
| 6.1.2.2 - Assessment of OH&S risks and other risks to the OH&S management system   |   |
| 6.1.2.3 - Identification of OH&S opportunities and other opportunities             |   |
| 6.1.3 - Determination of applicable legal requirements and other requirements      | 4.3.2 Legal and other requirements  |
| 6.1.4 - Planning to take action  |   |
| <b>6.2 - OH&amp;S objectives and planning to achieve them (title only)</b>         | 4.3.3 Objectives and programme(s)   |
| 6.2.1 - OH&S objectives  |   |
| 6.2.2 - Planning to achieve OH&S objectives  |   |
| <b>7 - Support</b>   |   |
| 7.1 - Resources  | 4.4.1 - Resources, roles, responsibility, accountability and authority  |
| 7.2 - Competence   | 4.4.2 - Competence, training and awareness  |
| 7.3 - Awareness  |   |
| 7.4 - Information and communication  | 4.4.3 - Communication, participation & consultation (title only)<br>4.4.3.1 - Communication   |
| <b>7.5 - Documented information (title only)</b>                                   | 4.4.4 - Documentation   |
| 7.5.1 - General  | 4.4.5 - Control of documents  |
| 7.5.2 - Creating and updating  | 4.5.4 - Control of records  |
| 7.5.3 - Control of documented information  |   |
| <b>8 - Operation</b>   | 4.4 - Implementation and operation (title only)   |
| 8.1 - Operational planning and control   | 4.4.6 - Operational control   |
| 8.1.1 - General  |   |
| 8.1.2 - Hierarchy of controls  | 4.3.1 - Hazard identification, risk assessment and determining control<br>4.4.6 - Operational control   |
| 8.2 - Management of change   |   |
| 8.3 - Outsourcing  |   |
| 8.4 - Procurement  |   |
| 8.5 - Contractors  |   |
| 8.6 - Emergency preparedness and response  | 4.4.7 - Emergency preparedness and response   |
| <b>9 - Performance evaluation</b>  |   |
| <b>9.1 - Monitoring, measurement, analysis and evaluation (title only)</b>         | 4.5 - Checking (title only)<br>4.5.1 - Performance measurement and monitoring   |
| 9.1.1 - General  |   |
| 9.1.2 - Evaluation of compliance with legal requirements and other requirements    |   |
| 9.2 Internal audit (title only)  | 4.5.5 - Internal audit  |
| 9.2.1 Internal audit objectives  |   |
| 9.2.2 Internal audit process   |   |
| 9.3 - Management review  | 4.6 - Management review   |
| <b>10 - Improvement</b>  |   |
| 10.1 - Incident, nonconformity and corrective action                               | 4.5.3 - Incident investigation, nonconformity, corrective action and preventive action (title only)<br>4.5.3.1 - Incident investigation<br>4.5.3.2 - Nonconformity, corrective action and preventive action |
| <b>10.2 - Continual improvement (title only)</b>                                   | 4.1 - General requirements  |
| 10.2.1 - Continual improvement objectives  | 4.2 - OH&S policy   |
| 10.2.2 - Continual improvement process   | 4.6 - Management review   |

## SUMMARY

ISO 45001 continues the strong tradition of developing occupational health and safety management systems to manage risk and reduce workplace illness and injuries but it is a step change from the philosophy of the OHSAS model in that it follows a new standard format and has been designed with compatibility with other standards in mind. It also has some subtle but important differences such as changes in terminology and in approach, focusing on structures to prevent undesirable events including more of a focus on safety culture and leadership, which were generally absent from OHSAS 18001.

The change to ISO 45001 to manage OHS risk is an important development and the fact that it has taken so long to come into the public domain can be read that the many stakeholders involved in its review and approval process have also recognised its importance and its potential influence into the future.

For organisations looking to transition between the old and the new, it is an exciting challenge but once it has been established in industry we can truly look forward to real integrated management systems with ISO 45001 at their core.

It is goodbye to an old friend who has helped many organisations to improve their safety performance and welcome to a new ISO 'kid on the block' who will hopefully take us further into the future, hand in hand with the expanding ISO family of standards.

1. OHSAS 18001:2007 – Occupational Health and Safety Management Systems – Requirement, Foreword, page iii
2. ISO 45001, Briefing Notes, Occupational Health and Safety, 2015
3. Introducing Annex SL Whitepaper - ISO Revisions - The new high level structure for all management system standards of the future - Approaching change

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