

ISO 45001

**Occupational Health and Safety
Management Systems Gap**

ISO 45001 Gap Analysis

If you're currently implementing an Occupational Health and Safety Management System (OHSMS) and aiming for ISO 45001 certification, this Gap Analysis will help you understand how compliant you are and where you need to do more work.

The ISO 45001 standard, like many ISO standards, includes some repetition and jumping from one clause to another. So, whilst this Gap Analysis is sequenced in the order of the clauses, some sections bring in elements from other clauses and some sub-clauses are skipped when they've been included elsewhere. The aim here is to help you audit in an organised way that largely reflects the standard but which is logical and understandable. It helps you look at the system as a whole - which is the way an Auditor will carry out the formal audit.

This document is not a complete checklist of everything that's covered in the ISO 45001 standard. Being able to tick 'Yes' to all the sections in here is no guarantee that you will achieve ISO 45001 certification. However, it's a very good starting point if you're new to ISO 45001 and it can help form the basis of your internal audits once your system is implemented.

The document starts with Clause 4 since the first three clauses do not contain auditable requirements.

Text in yellow italics indicates tips from the Global Standards Experts.

Please note that this document is for your own internal use only and has no official standing.

Clause 4 – Context of the Organisation

This clause requires that you determine the relevant external and internal conditions that may affect your organisation's existence and strategy. The 'context' relates to the business environment in which you operate.

Clause	Plain English Description	Yes	No	Gap Identified/Corrective Action Required	Owner	Target Date	Date Completed
4.1	Identified the external and internal issues that affect the organization and the OHSMS. <i>Possibly written down e.g. as a SWOT analysis. If not, must be able to explain your awareness to the Auditor. Don't forget to include 'legal requirements'. You might think this is simple but many organisations find it's a very useful exercise to write this down.</i>						
4.2	Clear understanding of needs and expectations of interested parties, in addition to workers, including customers and other stakeholders. <i>'Other stakeholders' could include regulators, suppliers, visitors. Remember to include legal and regulatory requirements of your customers.</i>						
4.3	Scope of the OHSMS clearly determined. <i>The scope of your OHSMS must be written down. It should describe your activities and the type of products and services you offer and justify if any requirement of the standard is not applicable to you. Remember, an ISO 45001 system does NOT have to cover the whole organisation; you can ringfence areas. Take advice from Global Standards.</i>						
4.4	The OHSMS is built and maintained in its entirety. You need to demonstrate an understanding of how you maintain and continually improve your system. (See also 9 and 10.) <i>In the past, ISO was seen as an exercise in writing lengthy documents. That's not the case now but some documentation and organisation is required.</i>						

Clause 5 – Leadership and Commitment

Top management cannot delegate overall responsibility for the OHSMS. They have to take ultimate responsibility and show real leadership, taking a proactive, hands-on role.

Clause	Plain English Description	Yes	No	Gap Identified/Corrective Action Required	Owner	Target Date	Date Completed
5.1	<p>Top management able to provide evidence that they take accountability for the OHSMS. Demonstrate they take overall accountability and responsibility for health and safety in the workplace.</p> <p><i>Able to answer questions, perhaps show minutes of meetings, have awareness of any improvement actions required.</i></p> <p><i>Without top management leadership, no initiatives will succeed. Support must be there and the Auditor will expect to have time to interview and discuss the system with them.</i></p>						
	<p>Occupational Health & Safety policy and objectives are aligned with the organisation's overall strategy and integrated into processes.</p> <p><i>Policy and objectives must be documented.</i></p>						
	<p>Evidence that top management actively promote the OHSMS amongst staff and direct and support them.</p> <p><i>Auditors might question random staff.</i></p> <p><i>Staff need appropriate awareness and training.</i></p>						
	<p>Resources (staff, time, budget etc.) are made available where necessary to support the functioning of the OHSMS.</p>						

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Clause	Plain English Description	Yes	No	Gap Identified/Corrective Action Required	Owner	Target Date	Date Completed
5.1	Ensuring that the OHSMS supports continual improvement. <i>Evidence from Internal Audits, Management Reviews etc. will help support this</i>						
	Promote a culture that supports your policy and objectives including protection of workers for reporting their concerns. <i>'Whistleblowers' must be protected when reporting incidents, hazards, risks, opportunities. Indeed, staff should be encouraged to do so.</i>						
	Workers are fully integrated into the OHSMS. <i>You must have processes for consulting workers and encouraging their participation. Must include Health & Safety Committee(s) (see 5.4).</i>						

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Clause	Plain English Description	Yes	No	Gap Identified/Corrective Action Required	Owner	Target Date	Date Completed
5.2	The documented OHSMS policy, which contains your objectives, should be relevant to your organisation and what you're trying to achieve. <i>Must contain commitments to: legal requirements; elimination of hazards; reduction of risks; engagement of workers; continual improvement.</i>						
	The OHSMS policy is available to all interested parties and communicated to them. <i>Should be visible to staff on noticeboard/ intranet, for example, and people should be familiar with it.</i>						
5.3	Responsibilities and levels of authority for individuals relating to the OHSMS must be understood. <i>A good way to check this is by random questioning of staff.</i>						
	Individual(s) with responsibility for ensuring the OHSMS conforms to ISO 45001 are identified. <i>The identified individuals must understand their responsibilities. Formal ISO training such as Internal Auditing is recommended. Auditors may question individuals to assess capability.</i>						
	Individual(s) with responsibility for reporting on the performance of the OHSMS have been identified. <i>Possibly the same people as above. Internal Audit reports can satisfy this. See also 9.</i>						

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Clause	Plain English Description	Yes	No	Gap Identified/Corrective Action Required	Owner	Target Date	Date Completed
5.4	Workers are consulted and participate wherever and whenever appropriate in all aspects of the OHSMS. <i>There could be an appointed representative(s) for the workers rather than liaising with each individual worker.</i>						
	Management facilitate participation by providing necessary resources (e.g. time, training) and removing barriers (e.g. language) to participation. <i>Make time for toolbox talks, for workers to have committee meetings etc. Also create a culture where workers are not afraid to speak up.</i>						
	Real emphasis on the role of non-managerial workers in the entire OHSMS from establishment of policy through to identification of hazards and risks, planning actions, delivery and maintaining and continually improving the system. <i>This cannot be emphasised enough. The Auditor will expect to see and hear strong evidence of this.</i>						

Clause 6 - Planning

As with all ISO management systems, addressing risks and opportunities one of the cornerstones of ISO 45001. This is all about ensuring that the expected results are achieved, and no unwanted incidents occur.

Clause	Plain English Description	Yes	No	Gap Identified/Corrective Action Required	Owner	Target Date	Date Completed
6.1	With reference to 4.1 and 4.2, be sure that the OHSMS can reduce/prevent undesirable effects and support continual improvement. Make sure you have actions identified to address these risks and opportunities and integrate them into your system. <i>This is one of the main purposes of an OHSMS, supporting the aim of continual improvement. Take into account risks, hazards, opportunities, legal requirements.</i>						
	Systems to evaluate the effectiveness of actions you take, considering risks, hazards and opportunities. <i>This is also connected to clause 9.</i>						
6.1.2	Develop a process for identifying hazards. Must take into account all factors e.g. how work is organised, past incidents, potential emergencies, equipment, substances etc. <i>This is one of the key parts of the standard. Leave no stone unturned. If you're unsure how to perform this or your ability to identify all hazards, perhaps consider a consultant.</i>						
	Able to assess risk based on the hazards identified. <i>Important to keep this documented. Be able to explain your method to the Auditor.</i>						
	Processes to assess opportunities to enhance health and safety performance and plans to address. <i>When a problem is identified, you need a process for determining what to do about it.</i>						

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Clause	Plain English Description	Yes	No	Gap Identified/Corrective Action Required	Owner	Target Date	Date Completed
6.1.3	<p>Legal requirements are taken into consideration.</p> <p><i>Keep up to date with legislation and how it applies to your organisation. This applies whether or not you're seeking ISO certification.</i></p>						
6.1.4	<p>Actions planned to address the risks, opportunities, legal requirements, emergency situations etc. identified above. Also able to evaluate effectiveness (see also 9).</p> <p><i>This is basically about ensuring you follow best practice for health and safety. Demonstrate to the Auditor how you ensure this and the process you've gone through to develop your plans.</i></p>						
6.2	<p>Have in place health and safety objectives relating to relevant functions / processes that support the OHSMS which are measurable, monitored, communicated and updated when needed.</p> <p><i>Familiarise yourself with the concept of SMART objectives and ensure they are documented and communicated. Could be broad issues but also details like reduction in slips, trips, falls. In determining the objectives and how to achieve them, consider what resources are needed, responsibilities, target dates and how results will be evaluated. Should be documented.</i></p>						

Clause 7 – Support

The organisation is required to establish and maintain the necessary infrastructure to ensure smooth operation and continual improvement of the Occupational Health and Safety Management System.

Clause	Plain English Description	Yes	No	Gap Identified/Corrective Action Required	Owner	Target Date	Date Completed
7.1	<p>Determined and provided the resources (people, budget, infrastructure, tools, IT etc.) to support the ongoing running of the OHSMS.</p> <p><i>You should be able to explain to the Auditor how you did this.</i></p>						
7.2	<p>Individuals are competent and records are kept as evidence.</p> <p><i>Relates to skills and experience of individuals. Consider training plans, certificates etc. Competence must be maintained perhaps through ongoing training, professional development. Keep records.</i></p>						
7.3	<p>Individuals are aware of the OHSMS, hazards and risks relevant to them, their roles, the benefits of improved health and safety performance and the implications of not conforming. Workers should also be aware that they can and should remove themselves from situations which are a danger to them.</p> <p><i>Individuals should be able to answer questions put by the Auditor to assess their awareness and understanding. They need to have sufficient organisational knowledge i.e. understanding of the workings of the organisation and the legal requirements applicable to the scope of activity.</i></p>						

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Clause	Plain English Description	Yes	No	Gap Identified/Corrective Action Required	Owner	Target Date	Date Completed
7.4	<p>The organisation must determine what to communicate with regard to the OHSMS (internal and external) e.g. what, to whom, how, when. Take into account barriers like language, literacy, disability etc.</p> <p><i>Health and safety is so important that this will require more than just a statement on the noticeboard or intranet. Auditors are likely to want to see all staff are briefed and involved on an ongoing basis. Communication should be two way, so workers can contribute.</i></p>						
7.5	<p>The level of documented information required for effective running of the OHSMS has been considered and created.</p> <p><i>Can be electronic. Only needs to be proportionate to size and complexity of your organisation, activities and competence of individuals. Must meet your legal requirements too.</i></p>						
	<p>Systems of control (e.g. title, date, author, reference number) and for updating documented information are in place. Must also be adequately protected (especially where confidential), accessible and retained.</p> <p><i>Don't forget to include relevant documentation from external sources.</i></p>						

Clause 8 – Operation

This is the ‘Do’ part of the Plan-Do-Check-Act (PDCA) cycle and is the day-to-day part of what your organisation does. This clause is at the very heart of the of your Occupational Health and Safety Management System.

Clause	Plain English Description	Yes	No	Gap Identified/Corrective Action Required	Owner	Target Date	Date Completed
8.1.1	Maintain processes to run the OHSMS and implement actions identified in Clause 6. <i>Learn about how to develop Safe Systems of Work (SSoW). Need to have control of processes and be able to demonstrate this. Need evidence to show to Auditor.</i>						
8.1.2	Processes for the elimination of hazards and reduction of risks. <i>Note use of the word ‘elimination’ - it’s absolutely key. Follow the ‘hierarchy of controls’ as stated in the ISO 45001 standard.</i>						
8.1.3	Process for controlling planned changes and to mitigate adverse effects. Includes new products and services, changes to existing ones, changes to workplace and infrastructure etc. <i>Whenever you make a change in the way you do things, or what you’re doing, you need to consider the impact on your health and safety performance.</i>						
8.1.4	Processes to control procurement of products and services to ensure conformity to your OHSMS. <i>When procuring from contractors or outsourcing activities, you still have responsibility for their health and safety performance. The level of control you have must be defined in your OHSMS.</i>						

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Clause	Plain English Description	Yes	No	Gap Identified/Corrective Action Required	Owner	Target Date	Date Completed
8.2	<p>Processes to ensure you are able to handle emergency situations. Include first aid, training, test drills and updating plans as necessary. All workers should be included in communications with no exceptions. Also include stakeholders like contractors, visitors.</p> <p><i>Testing of emergency arrangements is really important. You need to be very organised and procedural and keep documentation. You need to demonstrate you continually learn and develop your response.</i></p>						

Clause 9 – Performance Evaluation

The organisation is required to determine what needs to be monitored, how to monitor and when to do it.

Clause	Plain English Description	Yes	No	Gap Identified/Corrective Action Required	Owner	Target Date	Date Completed
9.1	Determined what needs to be monitored and measured and when. <i>Consider for example Accident Frequency Rates (AFR) and Site Safety Inspections.</i>						
	Established methods for monitoring, measuring, analysing, evaluating and when this should be done. <i>The above is used to evaluate conformity and effectiveness of processes and identify need for improvements in the OHSMS.</i>						
	Process and timetable for evaluating compliance with legal and other requirements. <i>Keep up to date with the law as it relates to your activities and health and safety generally.</i>						
9.2	Established and implement a planned approach to internal audits mindful of the frequency, methods, responsibilities, scope.						
	Results of internal audits are reported to management, appropriate corrective action taken. Document evidence is retained. <i>You may wish to attend an Internal Auditor training course.</i>						
9.3	Management review meetings are taking place as planned and documented evidence is available.						
	There is an appropriate agenda for the management review meetings to cover all requirements as stated in 9.3 of the standard.						
	There is documented evidence of the outputs of the reviews, identifying opportunities for improvement, any required changes to the OHSMS and how to resource any changes required.						

Clause 10 - Performance Evaluation

Underpinning the concept of an OHSMS are the principles of corrective action and continual improvement. The organisation must identify opportunities for improvement as well as introduce necessary actions.

Clause	Plain English Description	Yes	No	Gap Identified/Corrective Action Required	Owner	Target Date	Date Completed
10.1	Evidence that you react to, control and correct nonconformities and deal with the consequences. <i>You should have a procedure for this.</i>						
	Have a system for, and be able to provide examples of, reviewing and analysing nonconformities and implementing improvements to the OHSMS. <i>To ensure mistakes and errors are not repeated. This is the essence of continual improvement. For example, be able to demonstrate your accident investigation processes and how you report and record accidents.</i>						
	Review the effectiveness of any changes made to the OHSMS as a consequence of the above.						
	Overall, an approach to continually improve the suitability and effectiveness of the OHSMS. <i>Much of this will be covered in clause 9.</i>						

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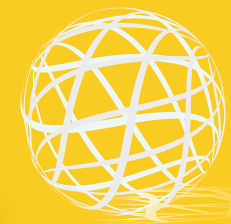
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E: info@gsc-co.com

T: 962 6 4024999

W: gsc-co.com



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