

Implementing ISO 45001 and transition from OHSAS 18001



ISO 45001



ICM CERTIFICATION PRIVATE LIMITED

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We at ICMCPL are convinced – and our experience has proven – that any organization, large or small, will achieve better performance by using the ‘plan-do-check-act’ approach outlined in the OHSAS 18001 and ISO 45001 standards.



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1. Introduction

The ISO 45001 standard for occupational health and safety (OH&S) management systems is currently being developed. This standard will replace the OHSAS 18001 standard in the next few years. Development of the ISO 45001 standard began in 2013, and publication is anticipated in early 2018. There is a three-year transition period starting from the point of publication.

The development of an ISO standard has a number of steps:

- ❖ Committee Draft (CD version)
- ❖ Draft International Standard (DIS version)
- ❖ Final Draft International Standard (FDIS version)

After every step there is a vote, on the basis of which it is determined if the next step in the development can be taken. With the CD and DIS versions, comments on the content may be submitted in addition to the vote. The FDIS version may only be voted on. The first DIS version of ISO 45001 was released in February of 2016, but was not approved. This means that a second DIS version had to follow. This version has been published on 19 May 2017. If it is approved, the FDIS version can follow by the end of 2017, with publication in early 2018. If there is little commentary on the second DIS version, the FDIS phase may be skipped and the standard can be published immediately. Publication will then take place at the end of 2017.

The ISO 45001's long development period has several consequences:

Organizations considering implementing a system based on OHSAS 18001 should wait to implement the new standard.

Some of the organizations certified for both ISO 14001 and OHSAS 18001 are intending to combine the transition to ISO 14001:2015 with the transition to ISO 45001. Since the transition to ISO 14001:2015 must be made before September 2018, this combination will now be more difficult.

ICMCPL recommends that organizations intending to implement an OH&S management system, or to make the transition from OHSAS 18001 to ISO 45001, should start implementation now based on the first or second ISO/DIS 45001 (the first was published in February 2016 and the second will be available on 19 May 2017) and not to wait for the publication of the definitive version of ISO 45001. In the meantime, organizations may still be certified on the basis of OHSAS 18001. Furthermore, certification audits may be done once the FDIS version is available. The certificate cannot be awarded until the standard has been published. The first and second DIS versions are complete enough that they can be used to set up the OH&S management system. The changes still to be made to the standard will not involve its substance.

This guide provides:

- ❖ information about the differences between ISO/DIS 45001:2016 and OHSAS 18001
- ❖ points for attention if an organization wishes to be OHSAS 18001-certified on the basis of ISO/DIS 45001
- ❖ indications of changes in the second DIS ISO 45001.

This guide is intended for both organizations wanting to begin implementing an OH&S management system and organizations wanting to make the transition from OHSAS 18001 to ISO 45001. The guide gives information that will simplify the implementation. No rights can be derived from this information; the certification process is determined by the final ISO 45001 standard and the ICMCPL certification scheme. This document offers suggestions and examples of how to apply the standard based on the second ISO/DIS 45001. Other solutions and examples are also possible. We have tried to provide information about elements of the future ISO 45001 where we expect there to be many questions. You will still need to study the ISO 45001 standard yourself, since there will be other differences not covered in this document.

The following documents are relevant in addition to this one:

- ❖ ISO/DIS 45001:2016 (February 2016)
- ❖ OHSAS 18001:2007
- ❖ [IAF ID 10: Informative Document 'Transition Planning Guidance for ISO 14001:2015](#)

Contact the national standardisation body for the purchase of the ISO/DIS 45001.2

2. Implementation based on ISO 45001 and certification to OHSAS 18001

Even if an organization aims to be certified in the short term on the basis of OHSAS 18001, it is recommended that it set up the OH&S management system on the basis of ISO/DIS 45001:

- ❖ There is no risk to the organization. The changes still to be made in the ISO 45001 standard will certainly have no influence on the foundation of the system implemented on the basis of the DIS version. If there are already differences in practice, they will be easy to work out.
- ❖ An OH&S management system set up on the basis of ISO/DIS 45001 has in principle already met the requirements in OHSAS 18001. There are a limited number of procedures and records required by the OHSAS 18001, and thus which must be in place in an audit against OHSAS 18001, but are not in ISO/DIS 45001. An overview of these procedures and records is included in this guide.
- ❖ In the long term (within three years of publication of ISO 45001), an OH&S management system certified to OHSAS 18001 must still be converted to ISO 45001. It will thus be more efficient to use ISO 45001 as a basis.
- ❖ If the OH&S management system is set up directly on the basis of ISO/DIS 45001, then it can be integrated with other management systems based on the HLS (high level structure) (such as ISO 14001:2015 and ISO 9001:2015).

Certification to OHSAS 18001:2007 can probably still be done in the transition period ending three years after the publication of ISO 45001 (this is the case in the regulations for transition to ISO 9001:2015 and ISO 14001:2015). The certificate will then be valid for less than three years, since these certificates also must be converted to ISO 45001 within three years of its publication.

Chapter 8 contains an overview of the points for attention in the event the management system set up on the basis of ISO/DIS 45001 is certified to OHSAS 18001. An overview of the differences between the first and second DIS version can be found in chapter 9.

3. Transition from OHSAS 18001 to ISO 45001

Organizations that have an OHSAS 18001 certificate have a period of three years after publication of the ISO 45001 to adapt the management system to the new standard. Certification audits against ISO 45001 can be done after the publication of ISO/FDIS 45001 (anticipated in autumn of 2017). The ISO 45001 certificate can only be issued once the ISO 45001 has been published and the certification body (CB) has been accredited for ISO 45001. In our experience, it will take several months before the first CBs have been accredited. Organizations with ISO 9001 and ISO 14001 certification that have already made, or are making, the transition to ISO 9001:2015 and/or ISO 14001:2015 may also wish to update their OH&S management system at the same time. This can be done using ISO/DIS 45001 as the basis (see chapter 2).

A logical time to make the transition is during the recertification period. Since recertification requires a complete audit of the system anyway, the additional time required to study the new standard will be at a minimum. Of course this is only feasible if there is enough time between the point of publication and recertification. However, the transition can also be made during a surveillance audit. The certifying body will, however, require extra time to determine whether the requirements of the new standard are being met.

The [IAF ID 10: Informative Document 'Transition Planning Guidance for ISO 14001:2015'](#) has recommendations for accreditation and certification bodies about the transition to ISO 14001:2015. These recommendations are also useful to consider in the transition to ISO 45001. The following points are of importance for certified organizations.

Gap analysis

The IAF ID 10 recommends that organizations wishing to be certified perform a 'gap analysis'.

The organization can save the certification body (CB) time on its evaluation by conducting a gap analysis, documenting how the differences between the requirements in the OHSAS 18001:2007 and ISO 45001 standards are, or will be, interpreted. To do so, the organization can use:

- ❖ the comparison of procedures/processes and documents in OHSAS 18001:2007 and ISO 45001 (see annex 1)
- ❖ this ICMCPL guide to differences between OHSAS 18001:2007 and ISO 45001
- ❖ the draft ICMCPL certification scheme for ISO 45001 (to be published mid-2017).

An organization can also hire the CB to conduct a gap analysis.

Planning the certification audit for ISO 45001

The certification audit for ISO 45001 can be planned separately, or combined with a surveillance or recertification audit for OHSAS 18001. In the latter case, the OHSAS 18001 certification will be maintained until all requirements of ISO 45001 have been met.

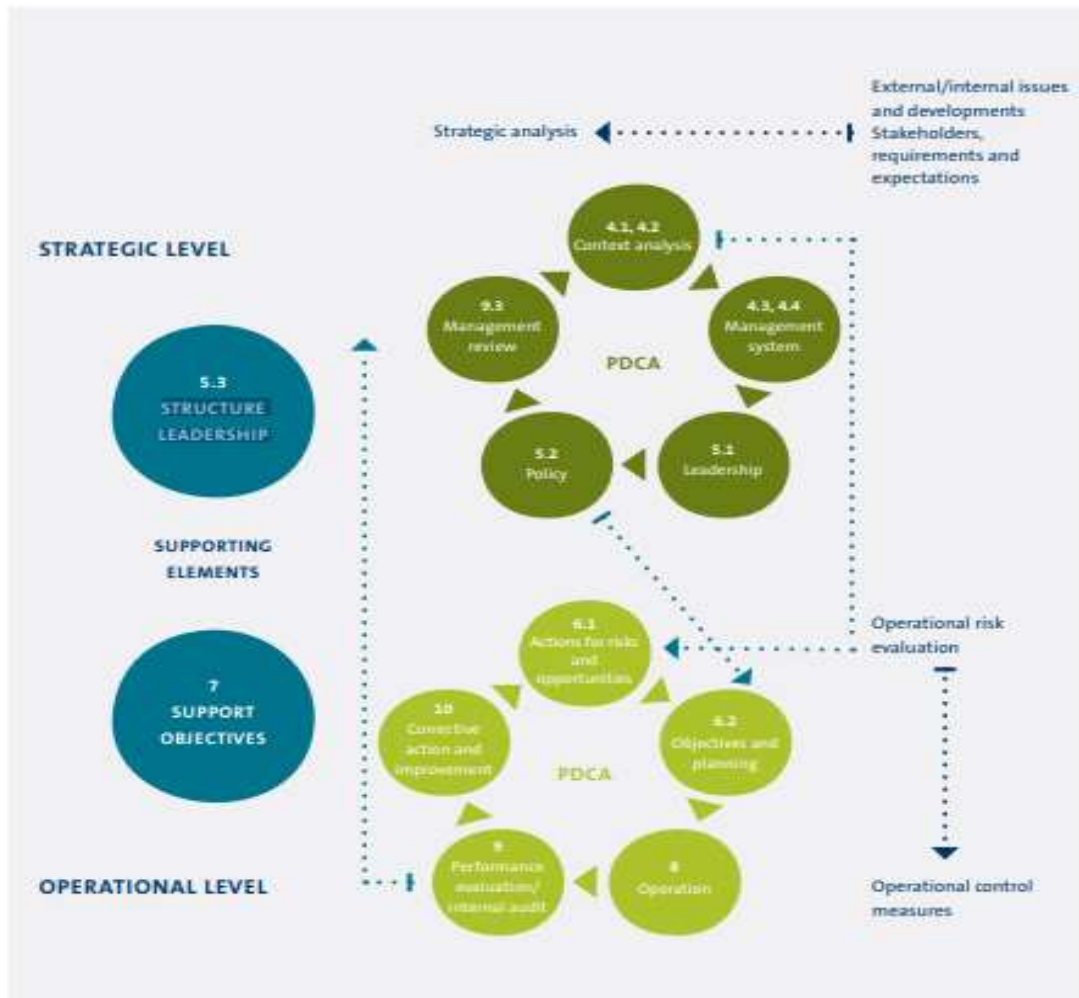
The CB must evaluate the complete conformity with the ISO 45001 standard. Like an initial audit for ISO 45001, both the documentation and implementation must be evaluated in the transition as well. The CB must decide on a case-by-case basis if these evaluations can be combined in a single audit or are better done separately. This will primarily involve the differences from 45001, and is based on the gap analysis mentioned above.

1. Purpose of ISO 45001

To make the differences between OHSAS 18001:2007 and ISO 45001 as elaborated in chapter 5 easier to identify, the purpose of ISO 45001 and the relationship between the elements of the standard are summarized in the following figures. The setups of ISO 45001 and ISO 14001:2015 are similar since all ISO management system standards are set up using the ISO-HLS (High Level Structure). This is explained in more detail in 4.1. Similar figures are also in the guide to the transition from ISO 14001:2004 to ISO 14001:2015.

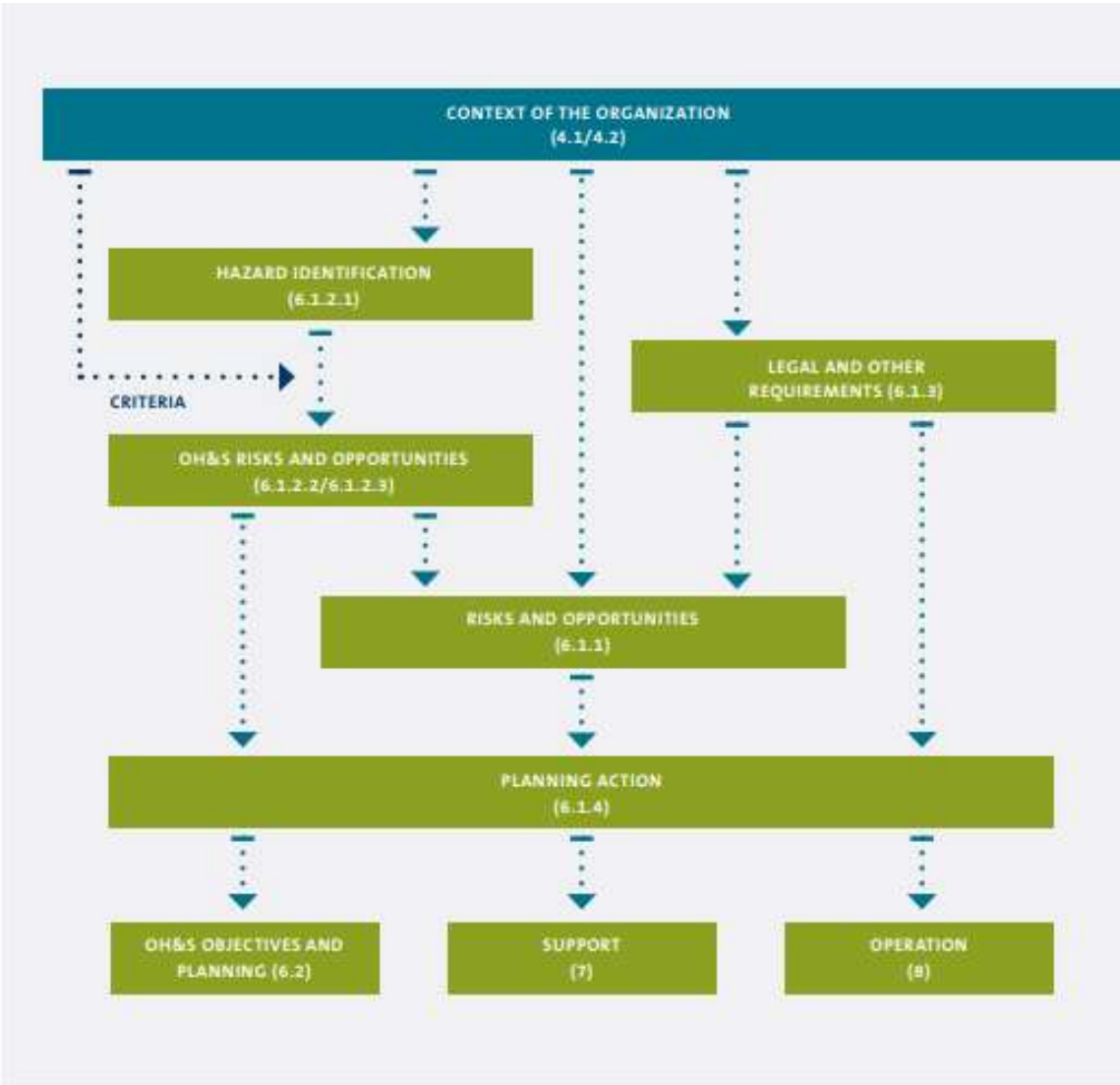
Figure 1 makes it clear that ISO 45001:2015 contains improvement cycles at both the strategic and operational levels. Analysing both context and interested parties (stakeholders) is an important input for the improvement cycle at strategic level. The strategic improvement cycle makes it easier to use ISO 45001 as a basis for corporate social responsibility (CSR) policy (based on ISO 26000, for example).

figure 1: PDCA cycle at strategic and operational levels (source: NEN)



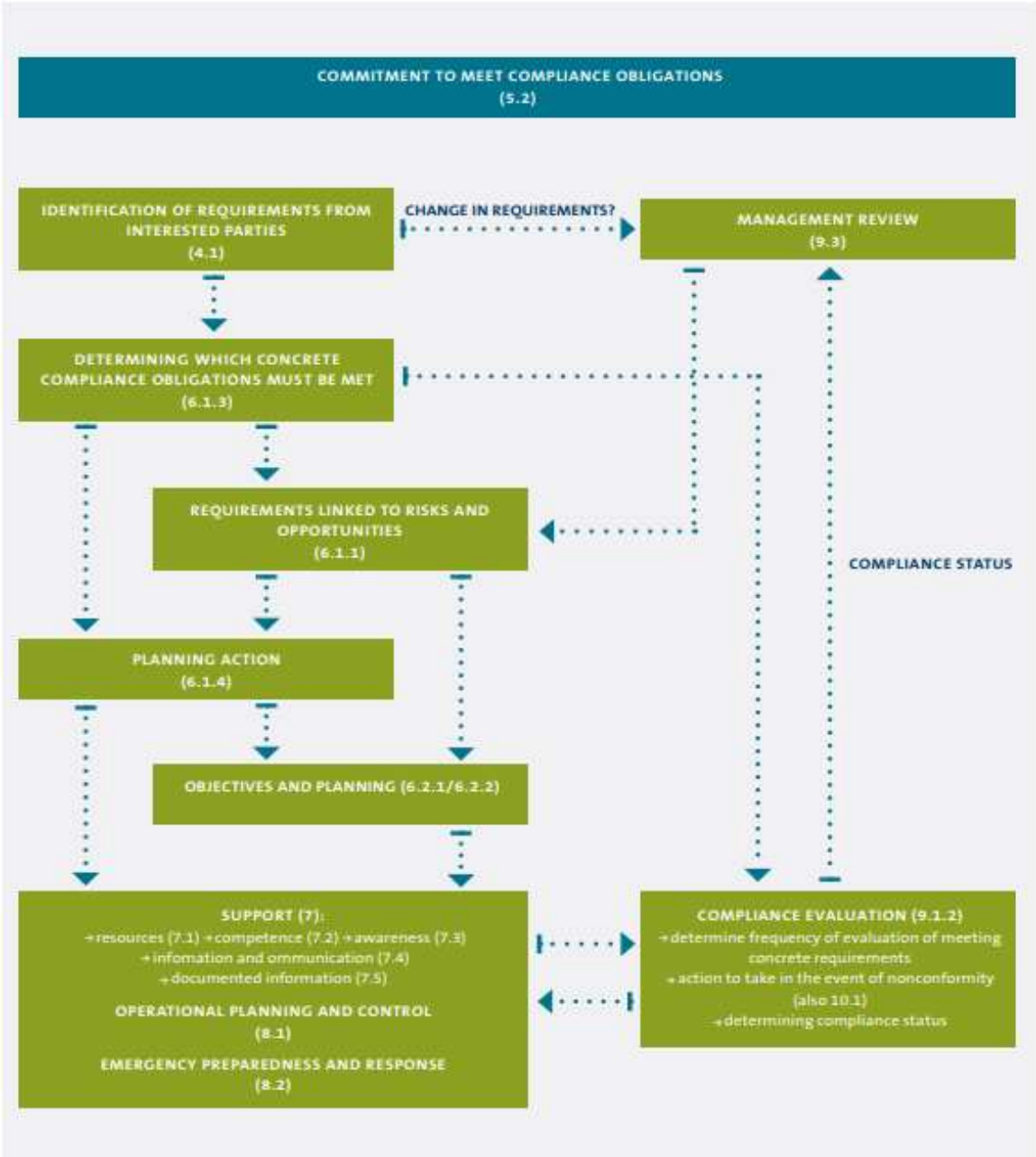
On the basis of the HLS, the term 'risk' as well as the term 'opportunity' were introduced in the ISO 45001. The ISO 45001 standard makes a distinction between OH&S risks and hazards and organizational risks and hazards. Figure 2 shows how they are related to each other and how they are related to the outcomes of the context analysis.

figure 2: Risk and Opportunities



Fulfilling compliance obligations (which includes legal and other requirements) is one important objective of the OH&S management system. Figure 3 shows the relationship between all of the elements of ISO 45001 that are important for compliance management.

figurE 3: Relationship of elements of the standard relevant for compliance m



5. Differences between OHSAS 18001:2007 and ISO 45001

5.1 Chapter division of standard based on ISO High Level Structure

Compared to the OHSAS 18001, ISO 45001 has a new division of chapters and sections, based on what is known as the ISO High Level Structure (HLS). ISO has determined that the structure of all standards for management systems will be based on the HLS and in each standard the basic text from the HLS with requirements for a management system will be used.

ISO 9001:2015 and ISO 14001:2015 are also based on the HLS. The basic HLS text for a management system can be recognized in all ISO standards for management systems, as well as in the new ISO 45001.

In the various management system standards, requirements for the specific area in question are added to the basic HLS text. Roughly half of the ISO 45001 standard is the HLS text and the other half is text specific for occupational health and safety management.

Many organizations with more than one management system have already integrated their management systems based on the old standards. Having management systems with the same structure and basic text makes it easier for organizations to integrate them.

Tip

The new chapter/section structure based on the HLS is not a reason to change anything in the management system. The important thing is that all requirements of the standard are met. If there is a manual for the management system (note this is not necessary!), it can be kept, although it is a good idea to add a reference table showing where the elements of the new standard are incorporated.

5.2 Main differences

The following table shows the main differences between the old and the new system, and whether the difference comes from the HLS or not. If an organization combines several management systems it is important to know whether the difference also applies to, for example, ISO 14001 (for environmental management systems) and the ISO 9001 (for quality management systems). This is important if the various management systems are combined. Since the ISO 45001 is a completely new text, all the differences cannot be listed. The table below shows the most important differences.

The column 'HLS' indicates whether the difference comes from the HLS, which applies to all ISO management systems. For some sections of the standard, there is both a 'Yes' (difference is due to HLS) and a 'No' (difference is not due to HLS). This is connected to the fact that there are requirements in ISO 14001 additional to those in the HLS. These requirements do not necessarily have to be in ISO 14001:2015 and ISO 9001:2015, for example. In developing ISO 45001, additions to ISO 14001:2015 based on the HLS were examined; several additions in the ISO 14001:2015 have been incorporated in ISO 45001. These will be explained in more detail below.

The first column indicates how different the section is from the OHSAS 18001:2007: ++: completely new
+ : an existing requirement has been added to or toughened

STANDARD SECTION	Difference between OHSAS 18001:2007 and ISO/DIS 45001.2 (may 2017)	HLS	Notes (i f necessary)
1 General	No written procedures are required.	Yes	The standard often uses the term 'processes'. These processes must be 'established, implemented and maintained'. In addition, 'documents' or 'records' are often required to demonstrate that elements of the system are present and functioning and that the processes are running correctly, under control and according to plan. An organization can choose to document its processes, either partly or completely. This can have several advantages: - transferring tasks from one employee to another is easier; - It is easier to find how to perform tasks that are not performed so often; - for the certification process, it is simpler to demonstrate that the processes are in place and that they are performed as described. The certification body will save time as a result.
2 General	The standard is geared to developing and implementing environmental policy at both 'strategic' and 'operational' levels.	Yes	OHSAS 18001 made it possible to limit the occupational health and safety (OH&S) management system to the operational health and safety policy (controlling the OH&S aspects and meeting legal requirements). Based on the new standard (the requirements in 4.1/4.2/5.1/6 etc.), it is necessary to involve risks and opportunities for the working condition and safety in the organization's strategic policy and conversely, to ensure that its health and safety policy is consistent with its strategic policy. See the example in Annex 2.
4.1 ++	Understanding the organization and its context (internal and external)	Yes	This element is to understand the important points or developments both inside and outside the organization that are (or can be) relevant for achieving the outcomes envisaged by the OH&S MS. The points or developments become relevant when they entail relevant risks or opportunities for the organization in the short or long term. The objective of the new standard is to coordinate the health and safety policy and the pursuit of sustainability with the organization's strategy (see also 5.1 leadership). Some very diverse points can emerge. See the example in Annex 2.
4.2 ++	Understanding the needs and expectations of interested parties	Yes	This is an entirely new requirement, which is also in line with the principle that under ISO 45001, the OH&S MS must be usable to address elements of the 'people' aspect of CSR (e.g. based on ISO 26000). Interested parties (stakeholders) exist both within and outside the

			organization. See the example in Annex 2.
4.3 +	<p>- Requirements are set for the description of the scope. - All activities, products and services of the organization that impact its OH&S performance must be included. - The description must be documented. In ISO 14001 it must be available for interested parties</p>	Yes	<p>ISO 45001 states that the boundaries and applicability of the OH&S MS must be determined to establish the scope. The OHSAS 18001 standard only required that the scope be established. While with OHSAS 18001 often only the activities were listed, it is important to also indicate other relevant 'boundaries' to make clear what is and is not covered by the certificate. Examples include physical boundaries, legal boundaries, or Chamber of Commerce data.</p> <p>ISO/DIS 45001.2 states that all operations, products and services that the organization can control or influence, and that influence its OH&S performance, must be included.</p> <p>Outsourced processes are now considered processes that the organization can control. The organization will have to establish how much influence it has in its scope. See the example in Annex 2.</p>
5.1 ++	<p>Emphasis on management's leadership role:</p> <p>- Top management must take responsibility for prevention of work-related injury and/or health as well as the provision of a safe and healthy workplace(s) and activities.</p> <p>- Top management must ensure that there are processes ensuring consultation and participation of workers.</p> <p>- Top management must ensure that employees who report incidents, hazards and risks are protected.</p> <p>- Top management must ensure there is an organizational culture that supports the expected results of the OH&S MS.</p> <p>- Relationship between strategy/</p>	<p>Yes</p> <p>No</p> <p>No</p> <p>No</p> <p>No</p>	<p>ISO 45001 makes top management's involvement in the OH&S management system explicit in thirteen points. The first of these is that top management must also 'take accountability' for the health and safety of employees. Under OHSAS 18001 it was possible for a company's top management to be uninvolved or hardly at all involved, only signing the management statement. ISO 45001 requires top management to take an active and proactive role, for example taking initiatives to improve OH&S performance and/or the OH&S MS. Top management will now have to be aware of the significant risks and opportunities, the expectations of interested parties and the organization's compliance status.</p> <p>The concept of 'culture' is new in ISO 45001. Culture must also be included in hazard identification (6.1.2). Explicit attention must be paid to culture in the interpretation of continual improvement (10.3).</p> <p>In the ISO 45001, top management is responsible for ensuring compatibility between the organization's OH&S policy and its strategy.</p>

	business processes	Yes	This means, on the one hand, that principles from the organization's strategy that are relevant for its OH&S policy can also be found in the OH&S policy, and conversely, that significant risks and opportunities from the OH&S policy can also be found in its strategy. A total integration is of course also possible.
5.3	Roles and responsibilities: there is not a designated 'management representative'.	Yes	As also indicated under 5.1, ISO 45001 puts a great deal of emphasis on the importance of leadership. Top management can delegate tasks but not responsibility. ISO 45001 requires personal involvement from top management in the OH&S management system.
5.4	Consultation and participation of employees - Process for consultation and participation must involve all phases of development and functioning of the OH&S MS. - Consultation of 'non-managerial' employees must be given extra emphasis on 9 points. - The same holds for participation on 7 points.	No	In OHSAS 18001 there is no distinction between participation and consultation. In OHSAS 18001, participation is focused on 4 points. In ISO 45001 a distinction is made between various phases of implementing and functioning of the OH&S MS and participation/consultation involves all elements of the management system. In ISO 45001 there is a distinction between 'managerial' and 'non-managerial' employees. Several points are mentioned where the organization must emphasize the involvement of 'non-managerial' employees.
6.1/6.1.1 ++	The requirement to identify 'opportunities' in addition to risks is new. A distinction is made between OH&S risks and opportunities and the organization's risks and opportunities	Yes	There is a new requirement to determine the risks and opportunities of the organization, which consist of: - OH&S risks and compliance obligations (which also must be determined on the basis of OHSAS 18001). Not all significant OH&S risks or compliance obligations are necessarily risks or opportunities. This means that it must be made clear which of the significant OH&S risks is/are a risk or opportunity for the organization. This is an extra step, which can be done using a risk analysis (or an additional one); - The more strategic risks and opportunities arising from the context of the organization (4.1 and 4.2). The various risks and opportunities (arising from the OH&S risks and opportunities; compliance obligations and context analysis) are important for planning to take action (6.1.4), formulating objectives (6.2.1) and finally, determining opportunities for continual improvement during the management review (9.3).
6.1.1	Addressing risks and opportunities related to: - functioning of the OH&S management system.	No	The consequences (risks) of the failure to function of the OH&S MS and the opportunities offered by a well-functioning OH&S MS must also be considered.

6.1.2	Hazard identification must include: - past incidents (both internal and external) - social factors such as work pressure, culture - emergencies. When determining and evaluating risks, include - effectiveness of existing measures; - issues from context analysis (4.1 and 4.2).	No	This element of ISO 45001 is identical to the hazard identification and risk evaluation in OHSAS 18001. As indicated in 6.1.1, there is a new requirement to identify opportunities as well. In ISO 45001 several perspectives have been more explicitly formulated.
6.1.4 ++	Planning to take action: the consequences of the identified risks and opportunities, significant, compliance obligations and emergency situations must be explicitly stated	Yes	This is a new element of the standard. The essence is that it be clear how the management system addresses the risks, opportunities, compliance obligations and emergency preparedness and response measures arising from 6.1.2, 6.1.3 and 8.2. This can take the form of control measures in the implementation section (8), or formulating objectives (including for improvement), as seen in 6.2. The 'familiar programme' from the OHSAS 18001 standard is now linked to the objectives (6.2.2). See figures 2 and 3 in chapter 3 and the example in Annex 2.
6.2 +	OH&S objectives: - Indicate how objectives are evaluated (including indicators for progress) - Integration of actions (to achieve these objectives) in other business processes	No	In essence the requirements from ISO 45001 agree with those in the OHSAS 18001 standard. The evaluation of objectives was included under monitoring in OHSAS 18001. New is that indicators must be determined to be able to evaluate progress. Another new aspect is that the organization must consider how the action(s) it takes to realize its objectives can be integrated in other business processes.
7.2 +	Determining necessary competences (for work, and to identify hazards).	Yes	Under OHSAS 18001 the organization had to ensure that 'everyone' had the necessary skills on the basis of appropriate education, training or experience to perform their assigned tasks. Although it was not required to document these skills (in the form of competences), the training needs had to be identified. ISO 45001 requires that the necessary competences (both to do one's job and to identify hazards) are first documented. Training courses, together with education and experience can ensure the necessary competences
7.3	Employees must be made aware of: - OH&S policy and objectives - incidents and results of investigations of incidents	No	OHSAS 18001 also has requirements regarding employee awareness. Several new items have been added in ISO 45001.

	- ways to leave the workplace in dangerous situations.		
7.4 ++	<p>- A process for internal and external communication must be implemented.</p> <p>- Contents of communication must be consistent and reliable.</p>	<p>Yes</p> <p>No (also in ISO 14001)</p>	<p>OHSAS 18001 requires that the organization have a procedure for internal communication and for communication with contractors and visitors. In ISO 45001 there must be a process to document what, when, with whom and how communication took place. Communication with contractors is also required based on 8.1.6.</p> <p>Another new element is that the organization must ensure that the communicated information is reliable and is consistent with the information arising from the OH&S management system.</p>
7.5.3 ++	Control of documented information has been added (7.5.3 b).	Yes	
8.1 +	<p>Operational planning and control:</p> <ul style="list-style-type: none"> - At sites with more than one employer, relevant elements of the OH&S MS must be coordinated with other organizations. - Establishing, implementing and maintaining the process for reducing hazards and OH&S risks on the basis of hierarchy of controls. 	No	<p>OHSAS 18001 does not mention coordination with other organizations at a site with multiple employers.</p> <p>In OHSAS 18001, control measures are established in the planning phase, and the hierarchy of controls must be kept in mind. This is in the operation section of ISO 45001 and is a required process.</p>
8.1.3	<p>Management of Change - Establish process.</p> <ul style="list-style-type: none"> - Both temporary and permanent changes. - Changes in legal and other requirements. - Changes in knowledge of hazards, technology, etc 	No	OHSAS 18001 has requirements regarding MoC in both hazard identification and operational control. ISO 45001 has a separate article in the chapter on Operation. ISO 45001 requires a process, and more points must be incorporated in the MoC process.
8.1.4	Contracted processes must be controlled. The degree of control is established in the OH&S MS.	Yes	The OHSAS 18001 standard has no requirements regarding contracted processes. ISO 45001 requires contracted processes to be controlled since the HLS requires it. This is nuanced in ISO 45001 because the degree of control can be indicated.
8.1.5	Control of procurement	No	OHSAS 18001 requires control measures. ISO 45001 requires that processes be implemented whereby there is a guarantee that procuring products and services conforms with the requirements in the OH&S MS

8.1.6	Contractors	No	OHSAS 18001 requires control measures. ISO 45001 requires a process for both identifying hazards and evaluating risks connected with contractors and a process for evaluating whether contractors and their employees meet the requirements in the OH&S MS.
8.2	Emergency preparedness and response - including first aid - communication and information to employees, contractors, etc. Documented information about process and plans	No (also in ISO 14001)	Several points in the section on emergencies in OHSAS 18001 have been made more explicit.
9.1.1 +	The following have been added - methods for monitoring, measuring, analysis and evaluation must be determined in order to ensure valid results - criteria and indicators for evaluating OH&S performance must be determined.	Yes No (also in ISO 14001)	- The quality of information is an important point for attention in ISO 45001. According to ISO 14001:2015, monitoring must yield valid results. This is also consistent with the requirement in 7.4 to communicate reliable information. - OHSAS 18001 requires that monitoring be geared to, among other things, OH&S performance and achieving the objectives. ISO 45001 adds the requirement to determine 'criteria' and 'indicators'.
9.1.2 +	The organization shall maintain knowledge and understanding of its compliance status.	No (also in ISO 14001)	The term 'compliance status' is new. It is considered to be the presence of an overall view of the state of affairs regarding compliance with legal and other requirements. OHSAS 18001 included the obligation to conduct an internal evaluation of compliance. This made it possible to delegate the evaluation and handling of any nonconformities to the departments or other levels, without acquiring an overview of the organization as a whole. Under ISO 45001, the organization must have an up-to-date view of its compliance.
9.3 +	- For the management review, instead of input, top management must determine which topics must be considered. Other new elements include changes in the needs and expectations of interested parties; risks and opportunities; the adequacy of means. - There are additional specifications for results of the management review about the output	Yes No	A number of changes in the ISO 45001 come together in the management review. This standard requires (on the basis of 5.1) more involvement from top management. In OHSAS 18001 the emphasis is on the 'input': drawing up a document that was then approved by top management. In ISO 45001 the emphasis is on the 'output'. The standard provides points that must be considered by top management. For a certificate to be issued, it must be clear that top management is actually involved in this process. There are other new elements in the management review, such as changes in the context analysis (4.1 and 4.2). There must also

			<p>be an evaluation of the adequacy of the resources the organization has made available.</p> <p>There is more emphasis on decisions that must be taken by top management, and these decisions have been specified. New elements requiring a decision include what action to take; opportunities for integration with other business processes, and the consequences for the organization's strategic direction</p>
10.3 +	Continual improvement must, in addition to improving OH&S performance, also be aimed at improving the culture supporting the OH&S MS.	No	The term 'culture' is new in ISO 45001 and is the responsibility of top management (see 5.1).

6. Procedures and processes in OHSAS 18001 and ISO 45001

The OHSAS 18001 requires the implementation of procedures for a number of elements in the OH&S management system. The term 'procedures' suggests that they must be laid down in writing. However, this is only required if explicitly mentioned, which it is in only a limited number of cases. The term 'procedures' is not used in ISO 45001, but the 'processes' which must be established, and implemented and maintained are comparable. The following table compares the requirements in OHSAS 18001 and ISO 45001 regarding procedures and processes. If a process is required, this means that the organization has determined what, how, when, by whom and in what way the necessary activities are performed.

OHSAS 18001 - Required procedures		ISO/DIS 45001.2 - PROSESS	
4.3.1	<p>Hazard identification, risk evaluation and establishing control measures</p> <p>The organization must establish, implement and maintain a procedure(s) for continually identifying hazards, evaluating risks and establishing the necessary control measures.</p>	6.1.1/ 6.1.2	<p>General</p> <p>The organization shall maintain documented information on: - OH&S risks and opportunities; - the process(es) and actions needed to determine and address its risks and opportunities (see 6.1.2 to 6.1.4) to the extent necessary to have confidence they are carried out as planned.</p> <p>The organization shall establish,</p>

			<p>implement and maintain a process(es) for hazard identification that is on-going and proactive.</p> <p>The organization shall establish, implement and maintain a process(es) to:</p> <p>a) assess OH&S risks from the identified hazards</p> <p>The organization shall establish, implement and maintain a process(es) to assess:</p> <p>a) opportunities to enhance OH&S performance, while taking into account:</p>
4.3.2	Legal and other requirements The organization must establish, implement and maintain a procedure(s) for identifying and having access to applicable legal and other OH&S requirements	6.1.3	<p>Determination of legal requirements and other requirements The organization shall establish, implement and maintain a process to:</p> <p>a) determine and have access to up-to-date legal requirements ...</p> <p>b) determine how these legal requirements and other requirements apply ...</p> <p>c) take these legal requirements and other requirements into account ...</p>
4.4.2	Competence, training and awareness The organization must establish, implement and maintain a procedure(s) to make persons working under its control aware of:	7.2	<p>Competence (no process required) The organization shall:</p> <p>a) determine the necessary competence of workers that affect or can affect its OH&S performance</p> <p>b) ensure that workers are competent on the basis of appropriate education, induction, training, or experience</p> <p>c) where applicable, take actions to acquire the necessary competence, and evaluate the effectiveness of the actions taken</p> <p>d) retain appropriate documented information as evidence of competence.</p> <p>Awareness Workers shall be made aware of:</p>
		7.3	<p>a) ... to e) ...</p>
4.4.3.1	Communication With regard to its OH&S hazards and its OH&S management system, the organization must establish, implement and maintain a procedure(s) for	7.4	<p>Communication The organization shall establish, implement and maintain the process(es) needed for internal and external information and communications relevant to the OH&S management system including determining:</p>
	a) internal communication		

	b) communication met contractors and other visitors in the work environment, c) receiving, documenting and responding to relevant communication from external interested parties		a) on what it will communicate; b) when to communicate c) with whom to communicate 1) internally among the various levels and functions of the organization 2) among contractors and visitors to the workplace; 3) among other external or interested parties. d) how to communicate
4.4.3.2	Participation and consultation The organization must establish, implement and maintain a procedure(s) for: a) worker participation by: b) consultation with contractors ...	5.4	Consultation and participation of workers The organization shall, establish, implement and maintain process(es) for consultation and participation of workers at all applicable levels and functions, and where they exist, workers' representatives in the development, planning, implementation, performance evaluation and actions for improvement of the OH&S management system. The organization shall: a) to e)
4.4.5	Document control Documents required by the OH&S management system and by this OHSAS standard must be controlled. Records are a special kind of document and their control must meet the requirements set in 4.5.4. The organization must establish, implement and maintain a procedure(s) to a) ... through g)		Documented information (no process required) When creating and updating documented information the organization shall ensure appropriate: a) identification and description (e.g. a title, date, author, or reference number) b) format (e.g. language, software version, graphics) and media (e.g. paper, electronic) c) review and approval for suitability and adequacy.
4.4.6	Operational planning and control The organization must identify the tasks and operations associated with the identified risks and for which control measures must be implemented to control OH&S risks. This must also include 'management of change' (see 4.3.1). For these tasks and operations, the organization must implement and maintain the following: a) through c) d) documented procedures, intended for situations where their absence could lead to deviations from the OH&S policy and objectives	8.1.1 8.1.2	Operational planning and control - General The organization shall plan, implement and control the processes needed to meet requirements of the OH&S management system, and to implement the actions determined in Clause 6, by: a) to e) At multi-employer workplaces, the organization shall coordinate the relevant parts of the OH&S management system with other organizations. Eliminating hazards and reducing OH&S risks The organization shall establish, implement and maintain a process(es) for the elimination of hazards and reduction of OH&S risks using the following hierarchy of control: a) to e).


		8.1.3	Management of change The organization shall establish a process(es) for the implementation and control of planned temporary and permanent changes that impact OH&S performance including: a) to d).
		8.1.6	Contractors The organization shall establish (a) process(es) , in coordination with its contractor(s) for hazard identification and to assess and control the OH&S risks, arising from the: a) contractors' activities and operations that impact the organization; b) organization's activities and operations that impact contractors' workers; c) contractors' activities and operations that impact other interested parties in the workplace. The organization shall establish and maintain processes to ensure that the requirements of the organization's OH&S management system are met by contractors and their workers. This process(es) shall define and apply OH&S criteria for the selection of contractors
4.4.7	Emergency preparedness and response The organization must establish, implement and maintain a procedure(s) to: a) identify potential emergency situations, b) respond to these situations	8.2	The organization shall establish, implement and maintain a process(es) needed to prepare for and respond to potential emergency situations, as identified in 6.1.2.1, including: a) to g).
4.5.1	Performance measurement and monitoring The organization must establish, implement and maintain a procedure(s) to periodically monitor and measure the OH&S performance. This procedure(s) must include the following: a) through f)	9.1.1	The organization shall establish, implement and maintain a process(es) for monitoring, measurement, analysis and performance evaluation. The organization shall determine: a) tot e)
4.5.2.1/ 4.5.2.2	As part of its commitment to compliance (see 4.2c), the organization must establish, implement and maintain a procedure(s) to periodically evaluate its compliance with relevant legal and other requirements (see 4.3.2).	9.1.2	Evaluation of compliance The organization shall establish, implement and maintain a process(es) for evaluating compliance with legal requirements and other requirements (see 6.1.3). The organization shall: a) to d)
4.5.3.1	Incident Investigation The organization must establish, implement and maintain a procedure(s) to record, investigate and analyse incidents in order to: ...	10.2	Incident, nonconformity and corrective action The organization shall stablish, implement and maintain a process(es), that include(s) reporting, investigating and taking action, to determine and

			manage incidents, and nonconformities. When an incident or a nonconformity occurs, the organization shall: a) to g)
4.5.3.2	Nonconformity, corrective and preventive measures The organization must establish, implement and maintain a procedure(s) to deal with any real and potential nonconformity(-ies) and for taking corrective and preventive measures. The procedure(s) must define requirements for: a) through e).	10.2	See above
4.5.4	Control of records The organization must establish, implement and maintain a procedure(s) for the identification, storage, protection, retrieval, retention and disposal of records	7.5.3	Control of documented Information (no process required) Documented information required by the OH&S management system and by this International Standard shall be controlled to ensure: a) it is available and suitable for use, where and when it is needed b) it is adequately protected (e.g. from loss of confidentiality, improper use, or loss of integrity). For the control of documented information, the organization shall address the following activities, as applicable:
4.5.5	Internal audit Audit procedure(s) shall be established, implemented and maintained that address:	9.2.2	Internal audit programme The organization shall: a) plan, establish, implement and maintain an audit programme(s) including the frequency, methods, responsibilities, consultation, planning requirements and reporting, which shall take into consideration the importance of the processes concerned and the results of previous audits, b) define the audit criteria and scope for each audit, c) to f)
		8.4	Procurement The organization shall establish, implement and maintain a process(es) to control the procurement of products and services in order to ensure

7. Documentation requirements in OHSAS 18001 and ISO 45001

Along with the section numbers in the column for ISO/DIS 45001 is an indication whether the documentation requirements are based on the HLS. If they are, they

can be found in all ISO management system standards (including ISO 45001). If ISO 14001 is listed, this means that a similar obligation is not based on the HLS but is in ISO 14001:2015 as an additional requirement.

OHSAS 18001 DOCUMENTATION and REGISTRATION		ISO/DN 45001 REQUIRED	
DOCUMENTATION			
4.1	The organization must define and document the scope of its OH&S management system.	4.3 (HLS)	The scope shall be available as documented information.
4.2 e)	op management must define and approve the OH&S policy of the organization and ensure that it is documented, implemented and maintained within the defined scope of its OH&S management system.	5.2 (HLS)	The OH&S policy shall be available as documented information;
4.3.1	The organization must document and keep up to date the results of hazard identifications, risk evaluations and established control measures.	6.1.1 (ISO 14001)	The organization shall maintain documented information on: - OH&S risks and opportunities; - the process(es) and actions needed to determine and address its risks and opportunities (see 6.1.2 to 6.1.4) to the extent necessary to have confidence they are carried out as planned.
		6.1.2.2 (ISO 14001)	The organization's methodology(ies) and criteria for the assessment of OH&S risks shall be defined with respect to scope, nature and timing, to ensure that they are proactive rather than reactive and are used in a systematic way. Documented information shall be maintained and retained on the methodologies and criteria.
		6.1.3 (ISO 14001)	The organization shall maintain and retain documented information on its legal requirements and other requirements and shall ensure that it is updated to reflect any changes.
4.3.3	The organization must establish, implement and maintain documented OH&S objectives for the relevant functions and levels within the organization.	6.2.2 (HLS)	The organization shall maintain and retain documented information on the OH&S objectives and plans to achieve them.
4.4.1	resources, responsibilities, accountability and authority must be documented and communicated.	5.3	Top management shall ensure that the responsibilities and authorities for relevant roles within the OH&S management system are assigned and communicated at all levels within the organization and maintained as documented information.
4.4.2	The organization shall ensure that every person working under its control performing tasks that can influence OH&S conditions is competent, based on the appropriate education, training or experience, and it	7.2 (HLS)	d) retain appropriate documented information as evidence of competence.

	<p>must maintain records of these.</p> <p>In the training it must provide, or take other measures to fill these needs, evaluate the effectiveness of the training or the measures taken and keep training records.</p>		
4.4.3.1	receiving, documenting and responding to relevant communication from external interested parties.	7.4.1	The organization shall retain documented information as evidence of its communications, as appropriate
4.4.4 c)	a description of the core elements of the OH&S management system and the interactions between them and references to associated documents,		
4.4.6	<p>The organization must identify the tasks and operations associated with the identified risks and for which control measures must be implemented to manage the OH&S risks. This must also include 'management of change' (see 4.3.1).</p> <p>d) documented procedures, intended for situations where their absence could lead to deviations from the OH&S policy and objectives,</p>	8.1.1 (HLS)	<p>The organization shall plan, implement and control and maintain the processes needed to meet requirements of the OH&S management system, and to implement the actions determined in Clause 6, by:</p> <p>a) establishing criteria for the processes;</p> <p>b) implementing control of the processes in accordance with the criteria;</p> <p>c) keeping documented information to the extent necessary to have confidence that processes have been carried out as planned;</p>
4.5.1	<p>f) records of information and results of monitoring and measurement, sufficient to facilitate subsequent corrective and preventive action analysis.</p> <p>Records must be kept of calibration and maintenance activities and their results.</p>	9.1.1 (HLS)	<p>The organization shall retain appropriate documented information:</p> <ul style="list-style-type: none"> - as evidence of the results of monitoring, measurement, analysis and performance evaluation - on the maintenance, calibration or verification of measurement of equipment.
4.5.2	Compliance with legal and other requirements. The organization must keep records of the results of the periodic evaluations.	9.1.2 (ISO 14001)	d) retain documented information of the compliance evaluation result(s).
4.5.3.1	The results of investigations of incidents must be documented and maintained.	10.2 (HLS)	<p>The organization shall retain documented information as evidence of:</p> <ul style="list-style-type: none"> - the nature of the incidents or nonconformities and any subsequent actions taken;
4.5.3.2	d) recording and communicating the results of the corrective and preventive measures taken, and	10.2 (HLS)	<p>The organization shall retain documented information as evidence of:</p> <ul style="list-style-type: none"> - the results of any action and corrective action, including their effectiveness.
4.5.5	a) the responsibilities, competences and requirements for planning and conducting internal audits, reporting the results and maintaining the records of the audits,	9.2.2 (HLS)	f) retain documented information as evidence of the implementation of the audit programme and the audit results.

4.6	Records of management reviews must be retained.	9.3 (HLS)	The organization shall retain documented information as evidence of the results of management reviews.
		7.5.3	Documented information of external origin determined by the organization to be necessary for the planning and operation of the OH&S management system shall be identified as appropriate, and controlled.
		8.2	The organization shall maintain and retain documented information on the process(es) and on the plans for responding to potential emergency situations.
		10.3 (HLS)	The organization shall continually improve the suitability, adequacy and effectiveness of the OH&S management system, by: a) to d) e) maintaining and retaining documented information as evidence of the results of continual improvement.

8. Points of attention for certification on the basis of OHSAS 18001

This chapter contains the points needing additional attention if the OH&S management system has been implemented on the basis of ISO 45001 and if the organization is certified to OHSAS 18001:2007 in the transition period.

Procedures

ISO 45001 does not use the term 'procedures', but instead uses the term 'process(es)'. An organization must set up processes for various elements of the management system ('The organization shall establish and maintain processes to ensure that...'). In practice, a procedure and a 'process' will be the same. For a number of elements in the ISO 45001 standard, operations are described that must be carried out, without indicating 'that the organization shall establish and maintain process(es) ...'. This applies to the following elements in ISO 45001:

- > 7.2 Competence
- > 7.5.3 Control of documented Information
- > 9.2.2 Internal audit programme

Thus, although the above operations must be carried out in ISO 45001, but there does not need to be a process for them. There does need to be a process (or procedure) available for these elements if an organization is OHSAS 18001 certified using ISO 45001 as a basis.

Documentation

> OHSAS 4.3.1: documentation of the established control measures (in relation to results of hazard identification and risk evaluation). The control measures are determined in ISO 45001 sec. 6.4.1 (Planning to take action). Documentation of them is required on the basis of 6.1.1 (to the extent necessary...). The key point is that for OHSAS 18001 all control measures must be documented, and for ISO 45001, only insofar as their absence leads to problems.

> OHSAS 4.4.2 requires that the effectiveness of the training or the measure taken be evaluated and the associated records are retained. The evaluation of effectiveness must also be carried out on the basis of ISO 45001 (7.2 C where applicable, take actions to acquire the necessary competence, and evaluate the effectiveness of the actions taken). However, ISO 45001 does not require documentation of the evaluation.

> OHSAS 4.4.4 c requires 'a description of the main elements of the OH&S management system and their interaction, and reference to related documents'. ISO 45001 does not require this.

> OHSAS 4.6 requires that there be documentation of management reviews. ISO 45001 only requires documentation of the results of the management review.

9. Changes in the second ISO/DIS 45001

The first ISO/DIS 45001 (publication February 2016) received a great amount of comments. The international standards committee met several times to discuss these comments. The result, the ISO/DIS 45001.2, has been published on 19 May 2017. Many changes are textual and have no consequences for practice. The table below lists some more substantial changes that appear in the second DIS version

SECTION	SUBJECT	DIFFERENCE
3.3	worker person performing work or work-related activities that are under the control of the organization	The issue is work or work-related activities that are under the control of the Organization, independent of the relation to the person performing them, thus also if there is only partial control of these persons.
4.3	Once the scope is defined, the OH&S management system shall include activities, products and services within the organization's control or influence that can impact the organization's OH&S performance.	'Once the scope is defined' has been deleted. It is not clear what the practical consequences of this change will be.
5.1 e)	ensuring active participation of workers, and where they exist, workers' representatives, using consultation and the identification and removal of obstacles or barriers to participation;	Refined: ensuring the organization establishes and implements (a) process(es) for consultation and participation of workers (see 5.4);
5.1 k)	developing, leading and promoting a culture in the organization that supports the OH&S management system.	Clarified: an addition that the issue is a 'culture' that supports 'the intended outcomes' of the OH&S management system.
5.1 m)		Added: top management must consider setting up 'health and safety committees' and supporting their function.
5.2	Top management shall establish, implement and maintain an OH&S policy in consultation with workers 591 at all levels of the organization (see 5.3 and 5.4)	The last part of the sentence has been deleted. Throughout the text the involvement of workers has been made more nuanced and less specific. See also 5.1 e) and 5.2 f).
5.2 d)	d) includes a commitment to the control of OH&S risks using the hierarchy of controls	Has been reformulated without 'using hierarchy of controls' and with the addition of 'hazards'.
5.2 f)	includes a commitment to participation, i.e. the involvement of workers', and where they exist, workers' representatives, in the decision-making processes in the OH&S management system.	Added: commitment to 'consultation'. The last part of the sentence regarding 'decision making' has been deleted.
5.3	Organizational roles, responsibilities,	The term 'accountabilities' has been deleted

	accountabilities and authorities	in the main text.
6.1.1	The organization shall consider the effective participation of workers (see 5.4) in the planning process and, where appropriate, the involvement of other interested parties.	Deleted. Consultation and participation is already required on the basis of section 5.4.
6.1.2.1	Hazard identification The organization shall establish, implement and maintain a process for the on-going proactive identification of hazards arising. The process shall take into account but not be limited to: a) to h)	The order has been changed to indicate importance: - g) will become a) - h) will become b) At h) (later b) terms have been added: 'victimization, harassment and bullying'
6.1.2.3	planned changes to the organization, its processes or its activities;	Added changes in 'policies'
6.2.2 e)	e) how it will be measured through indicators (if practicable) and monitored, including frequency;	Has been reformulated, combining 6.2.2 e and f. 'measured' has been replaced by 'evaluated'. 'including frequency' has been Deleted
6.2.2		Added: how the actions to achieve OH&S objectives will be integrated into the organization's business process(es).
7.2 b)	b) ensure that these persons are competent on the basis of appropriate education, induction, training, or experience;	Added: including the ability to identify hazards. The term 'induction' has been deleted.
7.3 a)	Workers Persons doing work under the organization's control shall be made aware of: a) the OH&S policy;	Added: besides 'policy' also 'objectives'
7.3 e)	e) OH&S hazards and risks that are relevant for them.	Added: besides 'hazards and risks' personnel must also be made aware of 'actions determined'
7.3	NOTE The ILO's ILS recommend that where workers should be able to remove themselves and inform the organization of the circumstances, without risk of penalization.	Note has been moved to main text with another formulation (7.3 f): workers must be made aware of what the agreements are about removing themselves from dangerous places
7.4.1	Communication	Section has been brought into line with 7.4.1 in ISO 14001:2015: - The term 'information' will be deleted. - Added: establish, implement process ... - Added: Take into account legal requirements - Added: Ensure communication is consistent with... and reliable. - Removed: The organization shall define objectives ... and shall evaluate ... - Internal and external communication are now in separate sections.

7.5.3 b)	Access by workers to relevant documented information	Moved to Note: work out details on access to documentation for workers and their representatives
8.1.1	Operation, general d) determining situations where the absence of documented information could lead to deviations from the OH&S policy and the OH&S objectives;	Deleted (on the basis of 8.1.1. C an organization must maintain documented information to the extent necessary to ...)
8.1.1	On multi-employer workplaces, the organization shall implement a process for coordinating the relevant parts Of the OH&S management system with other organizations.	Deleted: 'process'. Activity must still be done, but there does not have to be a process for it.
8.1.2 c)	Hierarchy of controls c) use engineering controls	Added: and/or reorganization of work
8.2	Management of change	8.2 a) and b) have been combined. Clarified: process must involve - both temporary and permanent changes; - both new and changed products, processes and services.
8.4	Procurement	Added: The organization shall establish, implement and maintain process(es) to controls the procurement
8.5 d)	Contractors	Deleted: identification of OH&S risks of d) contractors' activities and operations to contractors' workers
8.6	The organization shall identify potential emergency situations; assess OH&S risks associated with these emergency situations (see 6.1.2) and maintain a process to prevent or minimize.....	Changed: identification has been deleted since this already is dealt with in 6.1.2.1. Organization must establish and implement a process to prepare for and respond to 'emergency situations'
9.1.1	Monitoring	Added: Documented information on maintenance, calibration or verification of measurement of equipment shall be retained
9.3	The outputs of the management review shall include decisions related to:	Added (in conformance with ISO 14001:2015): The results of the management review must contain: - ways to integrate the OH&S management system in other business processes - any consequences for the strategic direction of the organization
9.3	The organization shall communicate the relevant outputs of the management review to its relevant workers, and where they exist, workers' representatives.	Changed: - 'The organization' will become 'top management' - 'relevant workers' will become 'workers'
10.1	Process to manage incidents and non conformities	Added: Process to determine and manage incidents...

10.1 a)	a) react in a timely manner to the incident or nonconformity, and, as applicable: 1) take direct action to control and correct it;	Changed: - 'take direct action' will become 'take action'
10.1 b)	1) reviewing the incident or nonconformity;	Clarified: - investigating incident (instead of reviewing) and reviewing nonconformity
10.1 a) – f)		New item inserted: OH&S risks must be investigated before action is taken that can result in new or changed hazards.
10.2	Continual improvement	Clarified: - subsections deleted - 'implement continual improvement process' deleted - 'promote positive culture' replaced by 'promote a culture that supports OH&S management system' - 'ensure participation' replaced by 'promote participation'

Documents available for certification

The organization must have and keep the following documents/records available (for a period of three years for recertification):

- > Description of the scope (4.3)
- > OH&S policy (5.2)
- > Risks and opportunities needing attention (6.1.1)
- > The processes for addressing the risks and opportunities in 6.1.1-6.1.4 (6.1.1)*
- > Compliance obligations (6.1.3)
- > OH&S objectives (6.2.1)
- > Evidence of competences (7.2)
- > Evidence of communications activities (7.4.1)
- > Processes for operational planning and control (8.1)*
- > Processes for emergency preparedness and response (8.2)
- > Results of monitoring, measuring, analysis and (9.1.1)
- > Evaluation of compliance (9.1.2)
- > Internal audit programme and results of internal audits (9.2.2)
- > Results of management review (9.3)
- > Incidents, nonconformities and the results of corrective action (10.2)
- > Proof of the result of continuous improvement (10.3)

Documents/records ICMCPL recommends be available:

- > Results of the context analysis (see 4.1 en 4.2)
- > Description of the organization and responsibilities
- > Overview of documented information and records (including any descriptions of processes/procedures other than those more or less required on the basis of 6.1.1, 8.1 en 8.2)

* The documented information must be retained and updated to the extent necessary to create confidence that the processes have been implemented as planned.



Please do not hesitate to contact us if you have any questions. We will gladly help companies, organizations, consultants, supervisory bodies, certification bodies and other stakeholders.

ICM Certification Private Limited

Plot No. 638/262, 1st Floor Taajpur Pahadi, Jaitpur Road,
Badarpur, New Delhi- 110044 (India)

Mobile :- +91-9958995893, +91-901516 7703, 011-29892210

Email:- info@icmcertification.com , sales@icmcertification.com
www.icmcertification.com / www.icmcertifications.com