



Implementation of ISO 45001 and the transition from OHSAS 18001

We at SCCM 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.

Copyright SCCM

All rights reserved. Nothing included in this publication may be made public, and/or reproduced by means of printing, photocopying, microfilm or any other method, without prior written permission from SCCM.

Disclaimer

Although the utmost care has been taken with this publication, errors and omissions cannot be entirely excluded. SCCM therefore accepts no liability, not even for direct or indirect damage occurring due to or in relation with the use of the content of this publication.

Implementation of ISO 45001 and the transition from OHSAS 18001

N180103, the version of 13 March 2018

Content

CHAPTER 1		
1	Introduction	5
<hr/>		
CHAPTER 2		
2	Transition from OHSAS 18001 to ISO 45001	6
<hr/>		
CHAPTER 3		
3	Set-up ISO 45001	8
<hr/>		
CHAPTER 4		
4	Differences between OHSAS 18001:2007 and ISO 45001:2018	12
	4.1 Chapter format of the standard based on ISO High Level Structure	12
	4.2 Main differences	13
<hr/>		
CHAPTER 5		
5	Procedures and processes in OHSAS 18001 and ISO 45001	19
<hr/>		
CHAPTER 6		
6	Documentation requirements in OHSAS 18001 and ISO 45001	23
<hr/>		
ANNEXES		
1	Available documents for certification	26
2	Illustration ISO 45001: 2018 based on the example company 'Keizer's Pet Foods'	33

I Introduction

On 12 March 2018, the first version of the ISO 45001 standard for Occupational Health and Safety (OH&S) management systems was published. Officially, it is called NEN-ISO 45001:2018. The ISO 45001 standard will replace the OHSAS 18001 standard. From the time of publication, a transitional period of three years will commence for OHSAS 18001-certified organizations.

This information document is intended both for organizations that want to start implementing an OH&S management system, and organizations that want to make the transition from OHSAS 18001 to ISO 45001. The document provides information that will facilitate the implementation. No rights can be derived from this information; the ISO 45001 standard and the SCCM certification scheme for ISO 45001 are decisive for the certification process. This information document includes suggestions and examples with regard to the application of the ISO 45001 standard. Other solutions and examples are also possible. The intention is to provide the necessary information about ISO 45001 items that tend to raise many questions. It remains necessary, however, to carefully study the ISO 45001 standard yourself, because there will also be differences that are not mentioned in this information document.

In addition to this information document, the following SCCM publications are interesting for organizations planning to implement ISO 45001:

- 10 steps for setting up a management system
 - Information document - Example ISO 45001 at a small transport company 'Holland Transport'
 - Information document - Context analysis in ISO 45001
- www.sccm.nl offers more information documents with examples under 'Publications/downloads'

In addition to this informative document, the following external publications are also relevant:

- ISO 45001:2018
- OHSAS 18001:2007
- [IAF MD 21: Mandatory Document 'Requirements for the Migration to ISO 45001:2018 from OHSAS 18001:2007'](#)
- [IAF MD 22: Application of ISO/IEC 17021-1 for the Certification of Occupational Health and Safety Management Systems \(OH&SMS\)](#)

ISO 45001:2018 can be purchased at the [NEN-webshop](#).

2 Transition from OHSAS 18001 to ISO 45001

After the publication of the ISO 45001, OHSAS 18001-certified organizations will have a period of three years to adapt their management systems to the new standard. The ISO 45001 certificate can only be issued when the Certification Body (CB) has been accredited for ISO 45001.

The period of recertification is a logical time to make the transition. Since a full investigation of the system will be carried out anyway, the additional time needed to adapt to the new standard will be the least significant at this time. Naturally, this is only feasible when there is sufficient time between the moments of publication and recertification. Making the transition during a control audit is also possible. The certification body will however need additional time to determine whether the requirements of the new standard are being met.

The International Accreditation Forum (IAF) has published the document IAF MD 21 for the transition to ISO 45001:2018: Mandatory Document 'Requirements for the Migration to ISO 45001:2018 from OHSAS 18001:2007'. The following items are important for certified organizations.

Gap-analysis

The IAF MD 21 recommends a gap analysis of the organizations to be certified.

The organization can speed up the CB's assessment by conducting their own gap analysis, determining the way in which the differences between the requirements in the OHSAS 18001:2007 and the ISO 45001 are met. For this, the organization can make use of:

- the comparison of requirements, procedures/processes and documents in OHSAS 18001:2007 and ISO 45001 in this information document by SCCM;
- the SCCM ISO 45001 certification scheme.

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

Planning the certification audit for ISO 45001

The certification audit for ISO 45001 can be scheduled separately or combined with a review or reassessment audit for OHSAS 18001. In the latter case, the OHSAS 18001 certificate will be maintained until all requirements of the ISO 45001 standard have been met.

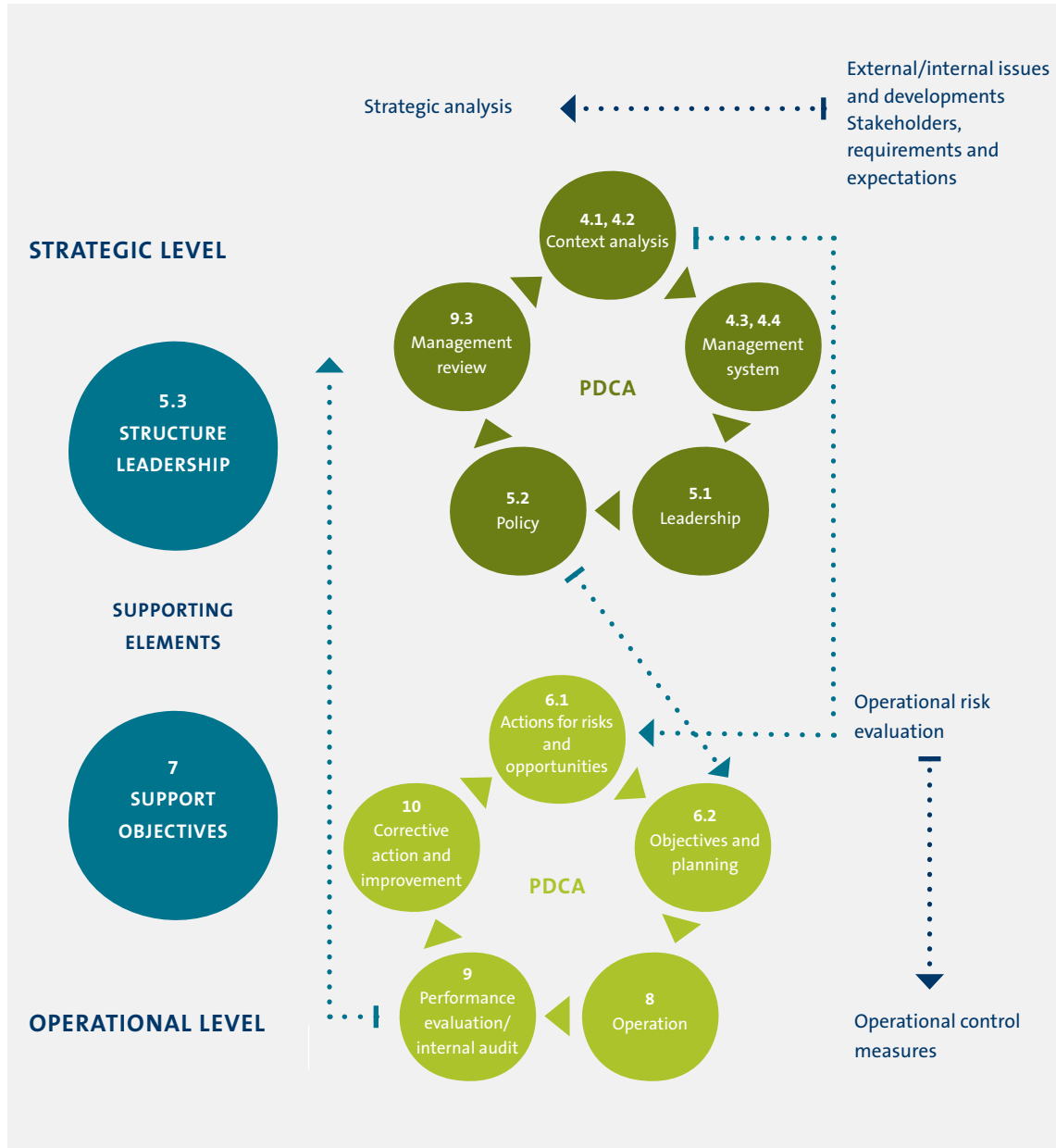
The CB must assess the complete conformity with the ISO 45001 standard. In accordance with an initial audit for ISO 45001, both the documentation and the implementation must be assessed during the transition. It is up to the CB to determine on a case-by-case basis whether these assessments can be combined in one audit or should be treated separately. This primarily concerns the differences with the OHSAS 18001 standard. The aforementioned gap analysis forms the basis for this.

3 Set-up ISO 45001

The following figures summarize the set-up of ISO 45001 and the coherence of the components of the standard and make it easier to identify the differences between OHSAS 18001:2007 and ISO 45001:2018 as elaborated in chapter 5. The set-ups of ISO 45001 and ISO 14001:2015 are comparable because all ISO management system standards are set up in accordance with the so-called ISO-HLS (High Level Structure). This is explained in 4.1. The information document about the transition from ISO 14001:2004 to ISO 14001:2015 also includes comparable figures.

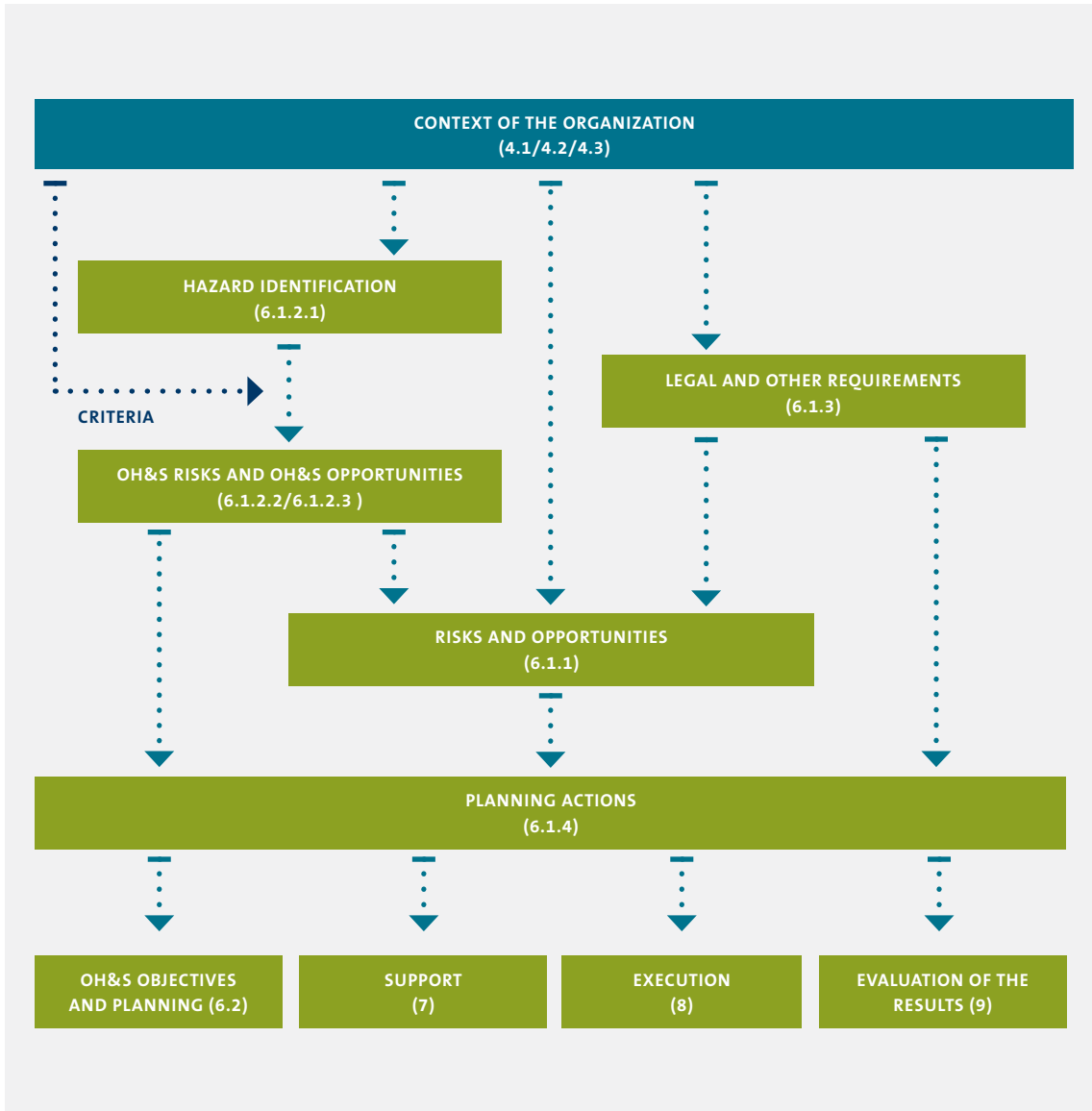
Figure 1 shows that ISO 45001 contains an improvement cycle at both strategic and operational levels. The analysis of context and stakeholders is an important input for the improvement cycle at strategic level. The strategic improvement cycle makes it easier to use ISO 45001 as the basis for the corporate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

FIGURE 1: PDCA CYCLE AT STRATEGIC AND OPERATIONAL LEVELS (SOURCE: NEN)



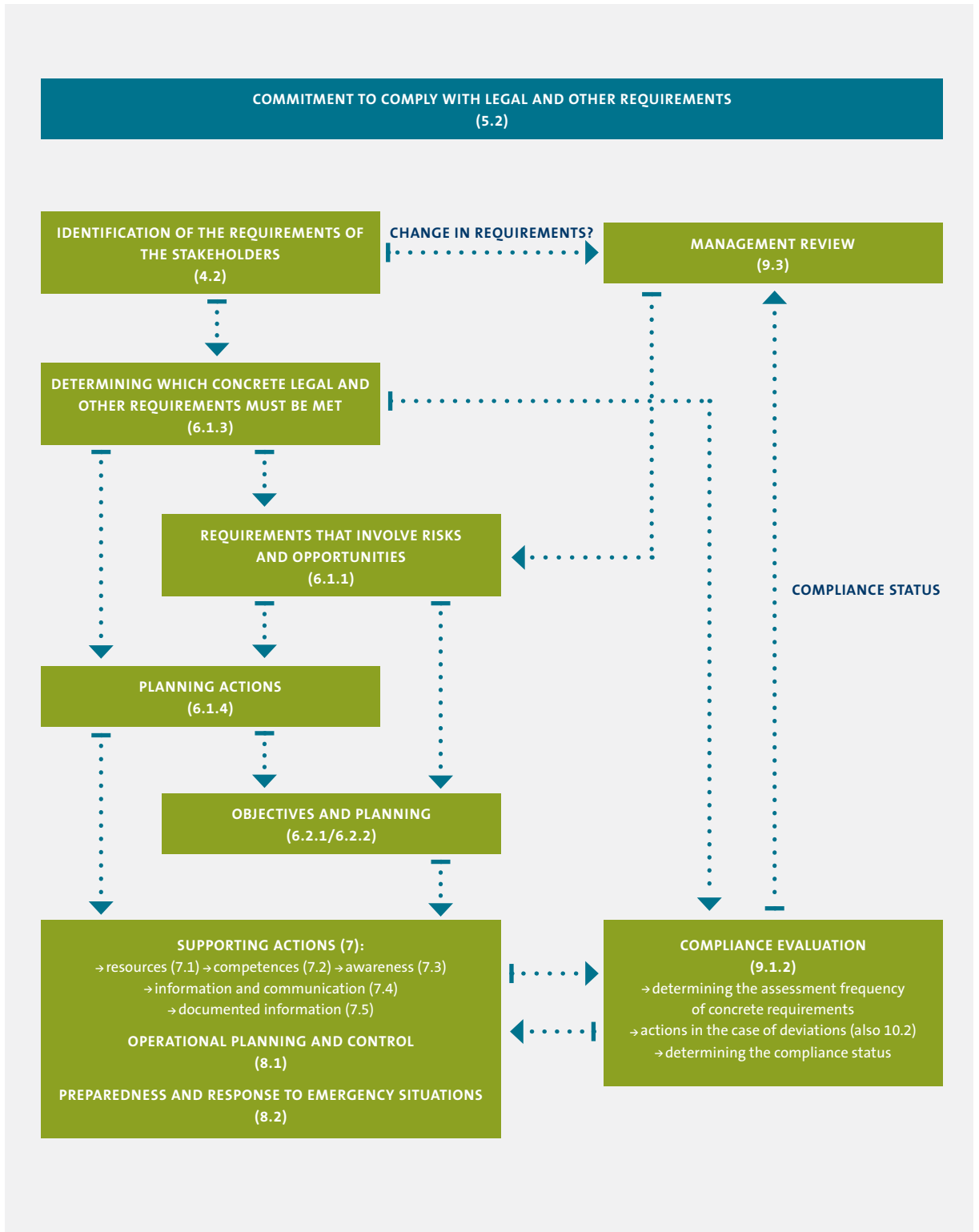
Based on the HLS, the ISO 45001 introduces the term ‘opportunity’ alongside the term ‘risk’. The ISO 45001 makes a distinction between OH&S risks and opportunities and organizational risks and opportunities. Figure 2 shows how these different types of risks and opportunities relate to each other and how they relate to the results of the context analysis.

FIGURE 2: RISKS AND OPPORTUNITIES



Meeting the compliance obligations (including legal and other requirements) is an important objective of the OH&S management system. Figure 3 shows the coherence between all the aspects of ISO 45001 that are important for compliance management.

FIGURE 3: COHERENCE OF STANDARD COMPONENTS RELEVANT TO COMPLIANCE MANAGEMENT



4 Differences between OHSAS 18001: 2007 and ISO 45001:2018

4.1 Chapter format of the standard based on ISO High Level Structure

Compared to the OHSAS 18001, the ISO 45001 features a new division of chapters and paragraphs, based on the ISO High Level Structure (HLS). ISO has stipulated that all standards for management systems will be designed on the basis of the HLS.

ISO 9001:2015 and ISO 14001:2015 are also based on the HLS. The HLS basic text for management systems is included in all ISO standards for management systems. This also applies for the ISO 45001.

In the various management system standards, the requirements that are appropriate to the respective subject are added to the basic HLS text. Roughly half of the ISO 45001 consists of HLS text; the other half concerns text that is specific to the occupational health and safety management system.

Many organizations have already integrated the management systems on the basis of the old standards. The identical layout and the basic text for organizations will make it easier to integrate the management systems.

TIP!

The new HLS-based division of chapters and paragraphs does not require any changes to the management system. It is paramount that all the standard requirements are met. If the management system is described in a manual (which is not necessary!), it can be maintained. It may, however, be useful to make a reference table in such case.

4.2 Main differences

The table below includes the main differences, mentioning whether the differences are attributed to the HLS or not. When an organization combines different management systems, it is important to know whether a particular difference also applies to, for example, ISO 14001 (environmental management systems) and ISO 9001 (quality management systems).

Given that a completely new text has been written for ISO 45001, it is not possible to mention all the differences. The table below lists only the main differences.

The 'HLS' column indicates whether the relevant difference originates from the HLS that applies to all ISO management systems. A number of standard paragraphs include both a 'Yes' (difference originates from the HLS) and a No (difference does not originate from the HLS). This is due to the fact that a number of requirements have been added to ISO 45001 compared to the HLS. This means that these requirements do not necessarily have to be included in ISO 14001:2015 and ISO 9001:2015, for example. During the development of ISO 45001, the additions to ISO 14001:2015 in comparison with the HLS have been considered. A number of the additions to ISO 14001:2015 have been incorporated in the new ISO 45001. More details are included in the explanation.

The first column indicates the extent of the differences in comparison with the OHSAS 18001:2007:

++: completely new;

+ : existing requirement has been complemented or tightened.

STANDARD PARAGRAPH	DIFFERENCES BETWEEN OHSAS 18001:2007 AND ISO 45001:2018	HLS	EXPLANATION (WHERE NEEDED)
1 General	No (written) procedures are required.	Yes	<p>The standard often uses the term 'processes'. These processes must be 'established, implemented and maintained'. In addition, 'documents' or 'registrations' are often required for demonstrating the presence and the operation of parts of the system, and that the processes run correctly, controlled and according to the planning.</p> <p>When a process has to be established, this means that the organization must be able to indicate what is done by whom, when and how to achieve the relevant standard requirement.</p> <p>An organization can choose to document all or part of the processes. This has a number of advantages:</p> <ul style="list-style-type: none"> > the transfer of tasks from one employee to another becomes easier; > it is easier to find how to perform tasks that are not performed so often; > it is easier to demonstrate during the certification, that the processes are in place and are carried out as described. As a result, the certification body will need less time.

2 General	The standard focuses on the development and implementation of OH&S policy at both 'strategic' and 'operational' levels.	Yes	OHSAS 18001 made it possible to limit the OH&S management system (OH&SMS) to the operational OH&S policy (managing the OH&S risks and meeting legal requirements). Based on the new standard, it is necessary to include the risks and opportunities for occupational health and safety in the strategic policy of the organization, and conversely, to ensure that the OH&S policy is in line with the strategic policy. This emanates from the requirements in, for example, 4.1/4.2/5.1/6. See also the example in Annex 2.
4.1 ++	Insight into the organization and its context (internal and external).	Yes	This is about gaining insight into the important issues or developments both inside and outside the organization which are (or can be) relevant to achieving the results targeted by the OH&SMS. The issues or developments become relevant when there are relevant risks or opportunities for the organization in the short or longer term. The objective of the new standard is to coordinate the organization's OH&S policy, its pursuit of sustainability, and its strategy (see also 5.1 leadership). Quite diverse issues may emerge. See the example in Annex 2.
4.2 ++	Insight into the needs and expectations of stakeholders.	Yes	This is an entirely new requirement, which also adheres to the principle that the ISO 45001-based OH&SMS must also be applicable to address items of the 'people' perspective of CSR (based on ISO 26000, for example). There are stakeholders both within and outside the organization. See the example in Annex 2.
4.3 +	<ul style="list-style-type: none"> > Requirements are set for the description of the scope. > All activities, products and services of the organization that affect its OH&S performance must be included. > The description must be documented. In ISO 14001 it must be available to the stakeholders. 	Yes	<p>ISO 45001 indicates that the limits and applicability of the OH&SMS must also be determined in the scope. The OHSAS 18001 only stated that the scope had to be determined. While often only the activities were mentioned on the basis of OHSAS 18001, it is equally important to indicate other relevant 'limits' in order to make clear what is and is not covered by the certificate. This includes, for example, physical limits, legal limits, Chamber of Commerce data.</p> <p>ISO 45001 requires that all activities, products and services that the organization can control or influence and that can impact the OH&S performance are included.</p> <p>Outsourced processes are included in the processes to be controlled. The organization will have to determine the extent of its influence in the scope.</p> <p>See the example in Annex 2.</p>

5.1 ++	<p>Emphasis on the management's leadership/ role:</p> <ul style="list-style-type: none"> > The management shall assume responsibility for the prevention of work-related accidents, illness and concerns etc. > The management shall ensure that there are processes for consultation and participation of the staff. > The management shall ensure that staff reporting incidents, hazards and risks are protected. > The management shall ensure a culture that supports the intended results of the OH&SMS. > The management shall ensure the compatibility with the strategic direction and integration in the business processes. 	<p>Yes</p> <p>No</p> <p>No</p> <p>No</p> <p>No</p> <p>Yes</p>	<p>ISO 45001 explicitly states the involvement of the management in the OH&S management system in thirteen points. The starting point is that the top management has to take the overall responsibility and accountability for the health and safety of all persons working for the organization. Under OHSAS 18001 it was possible there was hardly or no top management involvement other than signing the policy and management statement. ISO 45001 requires a (pro)active role for the top management. This entails, among other things, taking initiatives to improve the OH&S performance and/or the OH&SMS. For example, the top management will have to be aware of the important risks and opportunities, the expectations of stakeholders and the compliance status at all times.</p> <p>The introduction of the concept 'culture' is new in ISO 45001. Culture must also be included in the hazard identification (6.1.2). Explicit attention must also be paid to culture in the implementation of continuous improvement (10.3).</p> <p>ISO 45001 holds the management responsible for the coordination of the organization's OH&S policy and its strategy. This means that, on the one hand, principles from the organization's strategy that are relevant to the OH&S policy will also be stated in the OH&S policy. While on the other hand, risks and opportunities from the OH&S policy will also be found in the organization's strategy. Total integration is also possible, of course.</p>
5.3	<p>Roles and responsibilities: no designated 'management representative' is appointed.</p>	<p>Yes</p>	<p>As previously indicated under 5.1, the ISO 45001 puts great emphasis on the importance of leadership. The management can delegate the tasks, but not the responsibility. ISO 45001 requires the management's personal involvement in the OH&S management system.</p>
5.4	<p>Consultation and participation of workers</p> <ul style="list-style-type: none"> > The process for consultation and participation must involve all the development and functional phases of the OH&SMS. > The consultation of 'non-managerial' workers must be emphasized on 9 subjects. > The same applies to participation in 7 subjects. 	<p>No</p>	<p>OHSAS 18001 does not make a distinction between participation and consultation. OHSAS 18001 mentions four subjects on which participation focusses. In ISO 45001 a distinction is made between different phases of the implementation/functioning of the OH&SMS, and participation/consultation relates to all segments of the management system.</p> <p>In ISO 45001 there is a distinction between 'managerial' and 'non-managerial' workers. Different subjects that require the organization to emphasize the involvement of non-managerial workers are mentioned.</p>

6.1/6.1.1 ++	The requirement of identifying 'opportunities' is new. A distinction is made between OH&S risks and opportunities, and risks and opportunities of the organization.	Yes	<p>NA new requirement is that the risks and opportunities of the organization must be determined. These consist of:</p> <ul style="list-style-type: none"> > OH&S risks and compliance obligations (which must also be determined on the basis of OHSAS 18001). Not all OH&S risks and compliance obligations are necessarily risks (or opportunities). This means that it must be made clear which OH&S risks are actually a risk, or opportunity, for the organization. This is an additional step that can be completed with, for example, an (additional) risk analysis. > 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 actions (6.1.4), formulating objectives (6.2.1), and finally, for determining opportunities for continuous improvement as part of the management review (9.3).
6.1.2	<p>Hazard identification must include:</p> <ul style="list-style-type: none"> > past incidents (both internal and external); > social aspects such as work pressure, culture; > emergency situations. <p>Must be included when determining and evaluating the risks:</p> <ul style="list-style-type: none"> > the effectiveness of the existing measures; > issues resulting from context analysis (4.1 and 4.2). 	No	<p>This section of the ISO 45001 corresponds to the hazard identification and risk assessment in the OHSAS 18001. As indicated in 6.1.1, there is a new requirement that opportunities must also be identified.</p> <p>Several perspectives have been formulated more explicitly in ISO 45001.</p>
6.1.4 ++	<p>Planning of actions:</p> <p>The consequences of the identified risks and opportunities, compliance obligations and emergency situations must be explicitly stated.</p>	Yes	<p>This is a new section of the standard. The essence is that it is made clear how the risks, opportunities, compliance obligations and measures in the context of emergency situations, which result from 6.1.2, 6.1.3 and 8.2, are followed up in the management system. This follow-up may consist of control measures that take form in the operation (8), or in formulating (improvement) objectives, as reflected in 6.2. The 'programme' known from the OHSAS 18001 is linked to the objectives (6.2.2). See figures 2 and 3 in chapter 3 and the example in Annex 2.</p>
6.2 +	<p>OH&S objectives:</p> <ul style="list-style-type: none"> > Indicate how objectives are evaluated (including indicators for progress). > Integration of actions into other business processes. 	No	<p>In essence, the ISO 45001 obligations correspond to those of the OHSAS 18001. In OHSAS 18001, the evaluation of objectives was included under monitoring. A new aspect is that indicators must be determined in order to assess the progress.</p> <p>Another new aspect is that the organization is now required to consider how the actions intended to realize the objectives can be integrated into other business processes.</p>
7.2 +	Determining the required competences (to do the work and to enable identification of the hazards).	Yes	<p>Under OHSAS 18001, the organization had to ensure that 'everyone' was competent to perform the assigned tasks, based on appropriate education, training or experience. It was not required to substantiate skills and know-how (in the form of competences), but the training needs did have to be identified. ISO 45001 stipulates that the required competencies must be established first (both for the execution of the work and to be able to identify hazards). Together with education and experience, the training courses can provide the required competences.</p>

7.3	The workers must be made aware of: > OH&S policy and objectives; > incidents and results of incident investigations; > options to exit the workplace in dangerous situations.	No	OHSAS 18001 already included requirements with regard to raising awareness among personnel. A number of items have been added to ISO 45001 (such as the possibility of withdrawing from the work situation).
7.4 ++	> A process for internal and external communication must be implemented. > All communication content must be consistent and reliable.	Yes	OHSAS 18001 requires the organization to have a procedure for both internal communication and communication with contractors and visitors. ISO 45001 requires a process that shows what is communicated, with whom, how and when. Based on 8.1.6, communication with contractors is also required.
		No	Diversity aspects (such as language) must be taken into account.
		No (also in ISO 14001)	Another new requirement is that the organization must ensure that the communicated information is reliable and consistent with the information from the OH&S management system.
7.5.3 ++	The protection of documented information has been added (7.5.3 b).	Yes	
8.1 +	Operational planning and control: > At locations with multiple employers, all relevant items of the OH&S-MS must be coordinated with other organizations. > Establishing, implementing and maintaining the process for the reduction of hazards and OH&S risks, based on hierarchy of measures.	No	OHSAS 18001 does not mention coordination with other organizations at locations with multiple employers. In OHSAS 18001, control measures are established in the planning phase and the hierarchy of control has to be taken into account. In ISO 45001 this is included in the operations section, and a process is required.
8.1.3	Management of change > Establishing the process. > Both temporary and permanent changes. > Changes in legislation and regulations. > Changes in knowledge about, for example, hazards or technology.	No	In OHSAS 18001, the requirements regarding MoC (management of change) are included in both hazard identification and control of operations. ISO 45001 includes a separate article in the Operation chapter. ISO 45001 does require a process, and more subjects in the MoC process have to be included.
8.1.4	Procurement.	No	OHSAS 18001 requires control measures. ISO 45001 requires the introduction of processes for ensuring that products and services purchased are compliant with the OH&SMS.
	Contractors.	No	OHSAS 18001 requires control measures. ISO 45001 requires that identification of hazards and OH&S risks in the procurement processes are coordinated with the contractors. OH&S criteria must be used in the selection of contractors in the procurement processes.
	Outsourced processes must be controlled. The level of control is recorded in the OH&SMS.	Yes	OHSAS 18001 does not include requirements with regard to outsourced processes. ISO 45001 requires the management of outsourced processes because it is required by the HLS. This is nuanced in ISO 45001 because the degree to which the various outsourced processes are controlled can be indicated.

8.2	<p>Preparedness and response to emergency situations, including:</p> <ul style="list-style-type: none"> > first aid; > communication and information to the staff, contractors, etc. <p>Documented information about process and plans.</p>	No (also in ISO 14001)	Several items in the paragraph on emergency situations from the OHSAS 18001 have been made more explicit.
9.1.1 +	<p>The following requirements have been added:</p> <ul style="list-style-type: none"> > methods for monitoring, measurement, analysis and evaluation must be determined to ensure valid results; > criteria and indicators must be established to evaluate the OH&S performance. 	Yes	<ul style="list-style-type: none"> > The quality of the information is an important point of attention in ISO 45001. According to ISO 14001:2015, the monitoring must yield valid results. This is also consistent with the requirement of communicating reliable information stated in 7.4. > OHSAS 18001 requires the monitoring to focus on, among other things, OH&S performance and achieving the objectives. ISO 45001 supplements this with the requirement of determining 'criteria' and 'indicators'.
9.1.2 +	The organization must have knowledge and understanding about its compliance status.	No (also in ISO 14001)	The term 'compliance status' is a new concept. This translates as the presence of a total overview of the current situation regarding compliance with all legal and other requirements. OHSAS 18001 included the organization's obligation to conduct its own compliance assessment. It was possible to delegate the assessment and the handling of deviations to departments, for example, without creating an overall overview for the organization as a whole. Based on the ISO 45001, the organization must always be up-to-date in terms of compliance.
9.3 +	<ul style="list-style-type: none"> > For the management review, the topics that need to be considered have been stipulated, instead of the input. New items include, for example, the changes in the needs and expectations of the stakeholders, risks and opportunities, and the adequacy of resources. > The results of the management review are further specified in the output. 	Yes	<p>The management review in ISO 45001 features a number of changes. This standard requires (on the basis of 5.1) more involvement of the management. In OHSAS 18001, the emphasis was on the 'input': drawing up a document that was subsequently approved by the management. In ISO 45001 the focus is on the 'output'. The standard provides subjects that must be considered by the management. For a certificate to be issued, it must be clear that the management is actually involved in this process.</p> <p>Other new aspects such as changes in the context analysis (4.1 and 4.2) are also specified in the management review. This includes the assessment of the adequacy of the available resources.</p> <p>There is a greater emphasis on decisions that the management is required to make. The subjects of these decisions have been specified. New subjects that require decisions include, for example, the actions that need to be taken; the possibility of integration with other operational processes, and the consequences for the strategic direction of the organization.</p>
10.3 +	In addition to improving the OH&S performance, continuous improvement must also focus on improving the culture that supports the OH&SMS.	No	The concept 'culture' is new in ISO 45001 and falls under the responsibility of the management (see 5.1).

5 Procedures and processes in OHSAS 18001 and ISO 45001

The OHSAS 18001 requires the implementation of procedures for a number of items in the OH&S management system. The term ‘procedures’ suggests that they must be documented in writing. However, this is only required when it has been explicitly stated. This is the case only for a limited number of occasions.

The ISO 45001 has no reference of the term ‘procedures’, but the determining and implementing of ‘processes’ are similar. The following table compares the requirements in OHSAS 18001 and ISO 45001 with respect to the procedures and processes. When a process is required, this means that the organization has determined which necessary activities are carried out, how, when, by whom and how.

OHSAS 18001 - REQUIRED PROCEDURES		ISO 45001 - PROCESSES	
4.3.1	<p>Hazard identification, risk assessment and establishment of control measures.</p> <p>The organization must establish, implement and maintain one or more procedures for continuous hazard identification, risk assessment and the establishment of the necessary control measures.</p>	6.1.1/ 6.1.2	<p>General</p> <p>The organization must maintain documented information about:</p> <ul style="list-style-type: none"> > the process or processes and actions required to identify and address the risks and opportunities (see 6.1.2 to 6.1.4) to the extent necessary to be confident that they will be carried out as planned. <p>The organization must establish, implement and maintain one or more continuous and proactive processes for identifying hazards. The organization must establish, implement and maintain one or more processes to:</p> <ul style="list-style-type: none"> a) assess the OH&S risks b) identify and assess the other risks <p>The organization must establish, implement and maintain one or more processes to evaluate:</p> <ul style="list-style-type: none"> a) OH&S opportunities that improve the OH&S performance, taking into account ...
4.3.2	<p>Legal and other requirements</p> <p>The organization must establish, implement and maintain one or more procedures for the identification and accessibility of the applicable legal and other occupational health and safety requirements.</p>	6.1.3	<p>Identification of legal and other requirements</p> <p>The organization must establish, implement and maintain one or more processes to:</p> <ul style="list-style-type: none"> a) identify and access the currently applicable legal and other requirements ... b) determine how these legal and other requirements apply ... c) take these legal and other requirements into account ...

4.4.2	<p>Competence, training and awareness</p> <p>The organization must establish, implement and maintain one or more procedures to make persons working under its authority aware of: ...</p>	7.2	<p>Competence (no process required)</p> <p>The organization must:</p> <ul style="list-style-type: none"> a) identify the required competence ... b) ensure that he staff is competent ... c) take actions, if applicable, to ... d) keep appropriate documented information as proof of competence.
		7.3	<p>Awareness</p> <p>Employees must be made aware of: items a) to f) ...</p>
4.4.3.1	<p>Communication</p> <p>With regard to its OH&S hazards and its OH&S management system, the organization must establish, implement and maintain one or more procedures for:</p> <ul style="list-style-type: none"> a) the internal communication b) the communication with contractors and other visitors to the work environment, c) receiving, documenting, and responding to relevant communication from external stakeholders. 	7.4	<p>Communication</p> <p>For both the internal and external communication, the organization must establish, implement and maintain one or more processes that are relevant to the OH&S management system, including the determination of:</p> <ul style="list-style-type: none"> a) the topics to communicate; b) when to communicate; c) with whom to communicate: <ul style="list-style-type: none"> 1) internally, between ... 2) between contractors and ... 3) with other stakeholders; d) how to communicate.
4.4.3.2	<p>Participation and consultation</p> <p>The organization must establish, implement and maintain one or more procedures for:</p> <ul style="list-style-type: none"> a) employee participation through: ... b) consultations with contractors ... 	5.4	<p>5.4 Consultation and participation of employees</p> <p>The organization must establish, implement and maintain one or more processes for the consultation and participation of the employees, at all applicable levels, and in all applicable functions, including possible employee representatives, in the development, planning, implementation, assessment, and the performance of the OH&S management system, as well as for taking measures to improve it.</p> <p>The organization must:</p> <ul style="list-style-type: none"> a) to e)
4.4.5	<p>Document control</p> <p>Documents required by the OH&S management system and by this OHSAS standard must be controlled. Registrations form a special type of document and must be controlled in accordance with the requirements stipulated in 4.5.4.</p> <p>The organization must establish, implement and maintain one or more procedures to items a) ... to g)</p>	7.5	<p>7.5 Documented information (no processes required)</p> <p>When creating and updating documented information, the organization must ensure the appropriate:</p> <ul style="list-style-type: none"> a) identification and description ... b) format ... c) suitability and adequacy evaluation and approval.

4.4.6	<p>Operational control The organization must identify the operations and activities related to the identified risks for which control measures must be implemented to manage the occupational health and safety risks. This must also include management of change (see 4.3.1).</p>	8.1.1	<p>8.1 Operational planning and control In order to meet the OH&S management system requirements, and to implement the actions stipulated in chapter 6, the organization must plan, implement, manage and maintain the necessary processes, by: a) ... to d) ...</p>
	<p>For these operations and activities, the organization must implement and maintain the following: items a) to c) ...</p>		<p>At locations with multiple employers, the organization must coordinate the relevant items of the OH&S management system with the other organizations.</p>
	<p>d) Documented procedures intended for situations in which their absence could lead to deviations from the occupational health and safety policy and objectives.</p>	8.1.2	<p>The organization must establish, implement and maintain one or more processes to eliminate hazards and reduce OH&S risks, using the following hierarchy of control measures: items a) to e) ...</p>
		8.1.3	<p>Management of Change (MoC) The organization must establish one or more processes for implementing and managing both temporary and permanent planned changes affecting the OH&S performance, including: items a) to d) ...</p>
		8.1.4	<p>Procurement The organization must establish, implement and maintain one or more processes for controlling the procurement of products and services to ensure that ...</p>
			<p>Contractors The organization must coordinate its purchasing process(es) with its contractors to identify hazards, and to assess and control the OH & S risks arising from the: a) through c). In the procurement process(es) of the organization, OH&S criteria must be determined and applied for the selection of contractors.</p>
4.4.7	<p>Preparedness and response to emergency situations The organization must establish, implement and maintain one or more procedures to: a) identify possible emergency situations; b) respond to such emergency situations.</p>	8.2	<p>Preparedness and response to emergency situations The organization must establish, implement and maintain the necessary process(es) to prepare for and respond to potential emergency situations as identified in 6.1.2, including: items a) to g).</p>
4.5.1	<p>Performance measurement and monitoring The organization must establish, implement and maintain one or more procedures for regular monitoring and measuring of the occupational health and safety performance. This procedure(s) must include the following: items a) to f).</p>	9.1.1	<p>Monitoring, measuring, analysing and evaluating performance The organization must establish, implement and maintain one or more processes for monitoring, measuring, analysing and evaluating the performance. The organization must determine: items a) to e).</p>
4.5.2.1/	<p>In accordance with its compliance commitment</p>	9.1.2	<p>Compliance evaluation The organization must establish, implement and maintain one or more processes for evaluating the organization's compliance with all legal and other requirements (see 6.1.3). The organization must: items a) to d).</p>
4.5.2.2	<p>(see 4.2c), the organization must establish, implement and maintain one or more procedures to periodically evaluate the organization's compliance with the applicable legal and other requirements (see 4.3.2).</p>		

4.5.3.1	Investigation of incidents The organization must establish, implement and maintain one or more procedures to record, investigate and analyse incidents in order to: ...	10.2	Incidents, deviations and corrective measures The organization must establish, implement and maintain one or more processes for identifying and managing incidents and deviations, including reporting, investigating and taking measures. When an incident or deviation occurs, the organization must: items a) to g).
4.5.3.2	Deviations, corrective and preventive measures The organization must establish, implement and maintain one or more procedures for managing all factual and potential deviations, and for taking corrective and preventive measures. The procedure(s) must define the requirements for: items: a) t/m e).	10.2	See above.
4.5.4	Record management The organization must establish, implement and maintain one or more procedures to identify, store, protect, retrieve, store and delete records.	7.5.3	Management of documented information (no process required) As required by the OH&S management system and this document, all documented information must be managed to ensure that: a) the information is available and suitable ... b) the information is adequately secured ... For the management of documented information, the organization must interpret the following activities where applicable: ...
4.5.5	Internal audit Audit procedures must be established, implemented and maintained with a focus on: ...	9.2.2	Internal audit programme The organization must: a) plan, establish, implement and maintain one or more audit programmes including b) items b) to f).

CHAPTER 6

6 Documentation requirements in OHSAS 18001 and ISO 45001

The paragraphs in the column for ISO 45001 indicate whether the documentation requirements are required on the basis of the HLS. If they are, then they are included in all the ISO management system standards (including ISO 45001). When ISO 14001 is mentioned, this means that a similar requirement is not based on the HLS, but that it is included in the ISO 14001:2015 as an additional requirement.

OHSAS 18001 - DOCUMENTATION AND REGISTRATION		ISO 45001 – REQUIRED DOCUMENTATION	
4.1	The organization shall define and document the <u>scope</u> of its OH&S management system.	4.3 (HLS)	The <u>scope</u> shall be available in the form of documented information.
4.2 e)	The management shall define and authorise the organizations <u>OH&S policy</u> and ensure that within the defined scope of its OH&S management system it is documented, implemented and maintained.	5.2 (HLS)	The <u>OH&S policy</u> shall be: > available as documented information;
4.3.1	The organization shall document and keep the results of <u>identifications of hazards, risk assessments</u> and <u>determined controls</u> up-to-date.	6.1.1 (ISO 14001)	The organization shall maintain documented information on: > <u>risks and opportunities</u> ; > the process(es) and actions needed to <u>determine and address the its risks and opportunities</u> (see 6.1.2 to 6.1.4) to the extent necessary to have be confident that they are/will be carried out as planned.
		6.1.2.2 (ISO 14001)	Documented information shall be maintained and retained on the methodology(ies) 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 shall establish, implement and maintain documented <u>OH&S objectives</u> at relevant functions and levels within the organization.	6.2.2 (HLS)	The organization shall maintain and retain documented information on the <u>OH&S objectives and plans</u> to achieve them.
4.4.1	<u>Roles, responsibilities, accountabilities, and authorities</u> shall be documented and communicated.	5.3	Top management shall ensure that the <u>responsibilities and authorities</u> 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 any person(s) under its control performing tasks that can impact on OH&S is <u>(are) competent on the basis of appropriate education, training or experience</u> , and shall retain appropriate records. It shall provide training or take other action to meet these needs, evaluate the <u>effectiveness of the training or the actions taken</u> and retain the associated records.	7.2 (HLS)	The organization shall: d) retain appropriate documented information as <u>evidence of competence</u> .
4.4.3.1	Receiving, documenting and responding to relevant <u>communication from external interested parties</u> .	7.4.1	The organization shall retain documented information as evidence of its <u>communications, as appropriate</u> .
4.4.4 c)	A description of the <u>main elements of the OH&S management system and their interactions, and reference</u> to related documents.		
4.4.6	Operational control The organization shall determine <u>those operations and activities that are associated with the identified hazard(s)</u> where the implementation of controls is necessary to manage the OH&S risk(s). This shall include the management of change (see 4.3.1). d) Documented procedures, to cover situations where their absence could lead to deviations from the OH&S policy and objectives.	8.1.1 (HLS)	The organization shall plan, implement, 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: c) maintaining and retaining documented information to the extent necessary to have confidence that the processes have been carried out as planned.
4.5.1	f) recording <u>data and results of monitoring and measurements sufficient to facilitate</u> subsequent corrective action and preventive action analyses. Records of <u>calibration and maintenance activities and results</u> shall be retained.	9.1.1 (HLS)	The organization shall retain appropriate documented information: > as evidence of the <u>results of monitoring, measurements, analyses and performing evaluation</u> ; > on the maintenance, calibration or verification of the measuring equipment.
4.5.2	<u>Compliance with all legal and other requirements</u> . The organization shall keep records of the results of the periodic evaluation.	9.1.2 (ISO 14001)	The organization shall: d) retain documented information of the result(s) of the <u>compliance evaluating result(s)</u> .
4.5.3.1	The results of <u>incident investigations</u> shall be documented and maintained.	10.2 (HLS)	The organization shall retain documented information as evidence of: > the nature of the <u>incidents</u> or nonconformities and any subsequent actions taken.
4.5.3.2	d) Recording and communicating the results of corrective action(s) and preventive action(s) taken.	10.2 (HLS)	The organization shall retain documented information as evidence of: > the results of any action and corrective action including their effectiveness.

4.5.5	a) The responsibilities, competences, and requirements for planning and conducting <u>audits</u> , reporting results and retaining the associated records.	9.2.2 (HLS)	The organization shall: f) retain documented information as evidence of the implementation of <u>the audit programme and the audit results</u> .
4.6	Records of <u>management reviews</u> shall be retained.	9.3 (HLS)	The organization shall retain documented information as evidence of the results of <u>management reviews</u> .
		7.5.3	Documented information of external origin determined by <u>the organization to be necessary for the planning and operation of the OH&S management system shall be identified, as appropriate, and controlled</u> .
		8.2	The organization shall maintain and retain documented information on the process(es) and on the plans for responding to potential <u>emergency situations</u> .
		10.3 (HLS)	The organization shall must continuously improve the suitability, adequacy and effectiveness of the OH&S management system by: e) maintaining and retaining documented information as evidenceproof of <u>continuous improvement</u> .

I Available documents for certification

The organization must have the following documents/records available (for re-certification over a period of three years):

- Description of the scope (4.3)
- OH&S policy (5.2)
- Division of roles, responsibilities and authorities (5.3)
- Risks and opportunities (6.1.1)
- The processes and actions required to identify and address risks and opportunities in 6.1.2 - 6.1.4 (6.1.1)*
- The methodologies for assessing the OH&S risks and criteria to determine them (6.1.2.2)
- Compliance obligations (6.1.3)
- OH&S objectives and the plans to realize them (6.2.2)
- Evidence of competences (7.2)
- Evidence of communication activities (7.4.1)
- Processes for operational planning and control (8.1.1)*
- Processes and plans for preparedness and response to emergency situations (8.2)
- Evidence of the results of monitoring, measurements, analyses and evaluations of the performance (9.1.1)
- Evidence of maintenance, calibration or verification of equipment measurements (9.1.1)
- Compliance assessment (9.1.2)
- Internal audit programme and results of internal audits (9.2.2)
- Results of the management review (9.3)
- The background of incidents and deviations, measures taken and the results of measures and corrective measures, and their effectiveness (10.2)
- Evidence of the results of the continuous improvement process (10.3)

Documents/records recommended by SCCM:

- Results of the context analyses (see 4.1 and 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 and 8.2)

* The documented information must be maintained and retained to the extent necessary to have confidence that the processes have been carried out as planned.

2 Illustration ISO 45001: 2018 based on the example company 'Keizer's Pet Foods'

On the basis of the description of Keizer's Pet Foods Ltd. below, a possible elaboration of parts of the ISO 45001 standard has been given in Table 1 of this Annex.

Summary

Keizer's Pet Foods Ltd. is a producer of pet foods made from animal raw materials. Some of the intermediate materials are resold to other companies.

Keizer's Pet Foods Ltd. is owned by multiple shareholders. The shares are divided between the management (10%), the Keizer family (30%), and two external investors owning 30% each.

Organization

The company employs 105 persons who are active in the following departments:

- Management and Support (QHSE, Food Safety, P&S, Secretariat);
- Purchasing and Logistics;
- Warehousing;
- Financial Administration;
- Production;
- Laboratory;
- Sales;
- Technical Services.

The management team consists of the general manager, financial administration/purchasing manager, QHSE/ food safety manager, production manager and sales manager.

Approximately 30 persons work in the office, 4 in technical services, 6 in the laboratory, 65 in production and warehousing, and 9 people work in the field (sales and transportation of raw materials). Transport of finished products is carried out by an external transport company. The cleaning is outsourced to a cleaning company that specializes in industrial cleaning.

The technical service department employs several people for daily maintenance. A technical service provider is regularly present to carry out major maintenance of the technical installations.

The transport company working for Keizer's Pet Foods is its neighbour on the industrial estate. There is a direct passageway between the sites of Keizer's Pet Foods and the transport company. Part of the finished product is stored on the premises of the transport company.

Production operates in two shifts. Approximately 50 of the 65 employees in the production department are employed by Keizer's Pet Foods Ltd. and up to 20 are flexibly employed through a secondment agency specializing in international production personnel. Approximately 55 of the 65 employees are low-skilled. The low-skilled production employees all have different backgrounds. More than half them have very limited Dutch speaking and reading skills. In total, about 8 different languages are spoken.

Keizer's Pet Foods Ltd. offers employees the possibility to pay the trade union membership fee via their salary statement, which gives them a tax benefit. Approximately 10% of the permanent staff are trade union members.

Keizer's Pet Foods Ltd. has a contract with an occupational health and safety agency.

Works Council

Keizer's Pet Foods has a works council with 3 members: someone from the financial administration, a team leader from the packaging department and a staff member from the technical department. The composition of the works council has been unchanged for years. Over the years, multiple attempts have been made to get new Works Council members, but none of them have been successful so far.

Management system

The management system is set up for ISO 9001, ISO 45001, ISO 14001 and HACCP (food safety). Where possible, procedures and instructions have been integrated. The company has been certified for ISO 9001 since 1995. The ISO 45001, ISO 14001 and HACCP certifications have been added later.

The management system stipulates that:

- In principle, all activities (including the own transport) within Keizer's Pet Foods Ltd., with Chamber of Commerce no. 3242992 and branch number 2232345 fall under the OH&S management system. Unless the exceptions below have been made.
- In principle, all activities of the site at Industrieweg 8 in Leerveld fall under the OH&S management system.

Insofar as the influence extends, outsourced transport and outsourced cleaning activities also fall under the OH&S management system.

This means that the policies of both the cleaning and transport companies are assessed, agreements are closed concerning the execution of the contract regarding working conditions and safety during the performance of the cleaning and transport for Keizer Pet Food.

The scope of the ISO 45001 certificate is: developing, producing and selling food for small pets.

Building

The oldest parts of the company building were built in 1924, the latest parts in 2006. The company is located on a small industrial estate. On one side, the nearest house is situated at about 300 meters from the nearest house, and on the other side it borders on meadows. The building consists of various rooms, including a reception area for raw materials, a production area, waste water purification system, storage rooms for auxiliary materials, semi-finished products and finished products. In addition, part of the building has been set up as office space.

Process description

The following production activities take place at the company:

- supply and pre-treatment of raw materials;
- drying and evaporation;
- mixing, pressing and packaging.

The storage of raw materials, auxiliary materials and finished products is an important support process.

Supply of raw materials

Raw materials (such as offal and various dry materials) are supplied with the company's own trucks. Raw materials are partly poured out and partially unloaded with forklift trucks.

The most used raw materials are delivered in bulk and deposited in bunkers. Only less hazardous substances are delivered in small packages, on pallets. No raw materials are lifted; any spilled raw materials are immediately cleaned up.

Pre-treatment

Pre-treatment of offal, such as sorting (removing contaminants such as pieces of plastic, metal etc.), cutting and breaking of attached bone, degreasing (by heating and washing) and drying. There is a conveyor belt where part of the pre-processing takes place.

Employees at the conveyor belt remove large contaminants manually: standing work, with offal passing by on a moving belt. The employees wear gloves.

The cutting and breaking takes place in closed machines. Risks for employees arise when cleaning, changing blades and when the machines are jammed.

The production area is warm with relatively high humidity due to the heat released during the process; in some places spilled (fat) water makes the floor slippery.

Production of pet foods

With the semi-finished products acquired from the pre-treatment and other purchased raw materials, pet fodder is produced through mixing and kneading. Subsequently, the fodder is made into chunks through, among other things, cutting and drying. Only dry pet foods are produced, because a lot of heat is released during the production process.

Packaging

The factory produces various brands of pet foods (mainly for dogs and cats), both for its own brand in the higher market segment and for various customers' own brands. Each brand has its own packaging in plastic or paper bags. The customers indicate the desired type and size of the packaging for the product, and Keizer's Pet Foods ensures that the packaging is produced and printed in the customer's house style. Every product is available in different packaging sizes. Finished and packed products are then packed in boxes to prepare them for shipment to the distribution centres, after which they can be forwarded to the different sales outlets. The boxes are stacked on pallets and wrapped with shrink film to prevent damage.

The packaging process is fully automated, so no lifting of packaging materials is required. Dust is released during the packaging process. This dust is extracted, but the filters have to be replaced monthly by the staff.

External transporters take care of the transport of finished products from Keizer's Pet Foods to the distribution centres. On average, two freight movements of finished products are transported per day. Trucks are loaded through a dock with a forklift truck.

Facility processes

During the operations, waste water is released containing levels of pollutants too high to be drained unpurified. Therefore, the site features a biological water treatment system. The company has a steam boiler to produce the steam needed for the production process. In addition, there is a compressed air system with four compressors that are situated in the boiler house.

Two buildings at the company site have been set up for the storage of hazardous substances; one for storage up to 10 tonnes, and a second one other for large volumes where more than 10 tonnes are stored with, among other things, acids and alkalis, and where a large sulfuric acid tank is installed. Both buildings meet the PGS 15 requirements.

Internal and external communication

Internally, there are various consultations where occupational health and safety is a standing agenda item. Furthermore, an internal newsletter is published twice a year, in which occupational health and safety is a permanent topic. The report of the management review is available to the entire company. The newsletter is also sent to the companies that provide services to Keizer's Pet Foods Ltd. (cleaning company, technical service provider and transport company).

MoC procedure

The company has set up an MoC procedure for the correct implementation of changes. This procedure regulates the method to be followed in the event of changes in the business activities, processes, products and raw materials. Part of the described method includes the establishment of:

- the possible OH&S risks during the implementation, and the possible adjustment of the risks and opportunities after the implementation;
- the changes in legislation and regulations after the change (including permits);
- the necessary training and information needed after modification;
- the risks for the environment and measures to be taken.

ANNEX 2, TABLE 1: ISO 45001:2018 COMPLETION EXAMPLE FOR KEIZER'S PET FOODS

PARAGRAPH ISO 45001:2018	COMPLETION KEIZER'S PET FOODS
5.1 b Link with strategic policy	<p>Part of Keizer's Pet Foods' strategy includes an intention of sustainable entrepreneurship. It must be clear how this is linked to the OH&S policy. In the case of Keizer's Pet Foods, the main OH&S-related strategic questions are:</p> <ul style="list-style-type: none"> > Different OH&S risks are linked to the (partly outdated) production process. Due to the process, the production staff is heavily burdened by climate conditions and physical load. Improvement can be achieved through further automation/robotization. This outlines a strategically different approach. > Due to ever stricter requirements for hygiene and food safety, the strategic question is whether a part of the activities should be outsourced.
4.1 Insight into the organization and its context	<p>Based on the intention of sustainable entrepreneurship, Keizer's Pet Foods has carried out an extensive stakeholder analysis, using the ISO 26000 to identify topics. With regard to OH&S, the following important issues emerged from this analysis.</p> <p>Internal</p> <p>Examples of 'issues' from the organization itself:</p> <ul style="list-style-type: none"> > the working conditions in production (especially climate and physical load); > topics on which complaints have been submitted by the staff; > technological improvement possibilities; > the condition of the installations (maintenance situation, economically depreciated). <p>External</p> <p>The following 'issues' may arise on the basis of information from external parties:</p> <ul style="list-style-type: none"> > strategic and/or financial expectations of the shareholders; > developments in laws and regulations in the field of OH&S, food safety and fire safety; > technological developments (such as robotization); > wishes of the end customers (for example, organic foods, animal well-being).
4.2 Needs and expectations of the staff and other stakeholders	<p>The stakeholders for Keizer's Pet foods are:</p> <ul style="list-style-type: none"> > the staff (both permanently employed and flexible); > shareholders; > Inspectorate ministry of Social Affairs; > clients; > insurers; > branch organization; > trade unions; > occupational health and safety services; > emergency services (such as the fire department); > the employment agency providing flexible personnel; > cleaning company and service providers for maintenance. <p>It is important to consider whether there are relevant interests for each of the organizations mentioned. The expectations of each party have been examined. The information needed can be found on the basis of an investigation of written documents (an internet search for example) but also by contacting the various parties. The way in which information is collected and how parties are directly involved depends on the importance of the interest and the direct involvement.</p> <p>The expectations and needs of the staff are determined periodically by carrying out an employee satisfaction survey.</p>

<p>4.3 Scope</p>	<p>The scope of the OH&S management system covers all the activities of the site of Keizer's Pet Foods Ltd., located at Industrieweg 1 in Wameldam. Legally, it is limited to the following private limited companies, owned by Keizer's Pet Foods: Keizer's Productions Ltd., encompassing all production and support departments (including facility management, HSE), Keizer's Purification Ltd. and the office activities of Keizer's Sales Ltd. in the Netherlands. All these companies are registered at the same location. The sales offices in the Benelux region are not covered by the scope of the certificate.</p> <p>The cleaning and the transport of finished products are outsourced. To the extent of the company's influence, cleaning and transport are also covered by the OH&S management system. This means that the policies of both the cleaning and transport companies are assessed, agreements are closed concerning the execution of the contract regarding working conditions and safety during the performance of the cleaning and transport.</p>
<p>5.1</p>	<p>The management is ultimately responsible for the operation of the OH&S management system. For the interpretation of the items listed in 5.1, the management actively engages in such a way that it is aware of the most important risks and opportunities with regard to occupational health and safety, the compliance status, the views of the stakeholders and the various items of the OH&S management system. The management maintains regular contact with the project leaders of the improvement projects, monitors the progress and, if necessary, also makes timely adjustments. The necessary resources are made available.</p> <p>By also regularly taking part in inspection rounds and internal audits, the management stays well informed about the current operational situation, and at the same time, the importance of proper knowledge of the OH&S policy is emphasized among the employees.</p> <p>Once per quarter, during the weekly consultation, the management pays attention to the current situation regarding the achievement of the OH&S objectives.</p> <p>To promote the continuous improvement of the OH&S performance (par. 5.1), the management devotes a great deal of attention to the importance of improvement, and the input of employees to achieve it, for example by:</p> <ul style="list-style-type: none"> > communicating the risks and opportunities with the employees (during staff meetings and internal newsletters, for example), and inviting employees to contribute ideas; > openly rewarding employees with ideas for improving the production processes, for example; > communicating about projects that have been completed and their results.
<p>6.1.2 Hazard identification and establishment of risks and opportunities</p>	<p>Keizer's Pet Foods' Risk inventory and evaluation (RI&E) offered a fairly complete insight into the operational OH&S risks of the company's own production processes. To enable compliance with the ISO 45001:2018 requirements, this has been supplemented on a number of points:</p> <ul style="list-style-type: none"> > Opportunities in terms of improvements to the production process were identified and supplemented with the hazards and risks of the activities of external service providers at the site (cleaning, maintenance and transport). > The influence of the safety culture has also been considered in the assessment of the risks and implementation of the measures. > An overview of internal and external incidents and the possible related OH&S risks has been drawn up. To the extent where they were not yet included in the RI&E, they have now been added to the RI&E. > Keizer's Pet Foods had an emergency plan. The overview of the risks this plan was based upon has been updated and is now included in the RI&E. <p>Keizer's Pet Foods did not systematically identify the strategic risks and opportunities, so they have been linked to the policy plan. The topics include:</p> <ul style="list-style-type: none"> > The risk that the working conditions can be negatively affected by stricter legal requirements for food safety. > The possibility of eliminating risk through automation/robotization and outsourcing.

6.1.4 Planning of measures	<p>In order to indicate how the identified risks, opportunities and compliance obligations are handled, Keizer's Pet Foods has added a column in the RI&E and in the register of laws and regulations in which they can indicate whether the subject is managed procedurally (procedure or work instruction), organisationally (training, consultation, impact, ...), by supervision (supervision, checks, measurements, records), or technically (technical measures or facilities). With links in both registrations, this leads directly to the relevant measures.</p>
6.2 OH&S objectives	<p>A new element in the operations of Keizer's Pet Foods is the establishment of indicators for monitoring the realization of all the objectives. Where possible, the indicators are formulated in such a way that the performance can also be monitored at departmental level. For example, there are indicators for:</p> <ul style="list-style-type: none"> > the objective of reducing the number of accidents (with and without absenteeism); > the use of PPEs; > the noise level and temperature in the production areas. <p>In the MT, fixed moments have been agreed to discuss the progress and, if necessary, to formulate improvement measures.</p>
7.2 Competences	<p>Keizer's Pet Foods had an overview of the education/training required for each function. In order to comply with ISO 45001:2018, the following has been defined per function:</p> <ul style="list-style-type: none"> > job description and responsibilities; > the main risks (linked to OH&S risks and compliance obligations); > the required knowledge and experience (to perform the tasks and deal with the risks); > possible education/training to gain knowledge (possibly mandatory training) > the way in which competences are taught in addition to the training programmes (for example, by means of a familiarization programme, internal training or information sessions, toolbox); > frequency of repeating the training/information sessions (when necessary).
7.3 Awareness	<p>Keizer's Pet Foods carries out the following activities to ensure that employees are aware of the OH&S risks and compliance obligations:</p> <ul style="list-style-type: none"> > There is a basic knowledge and awareness based on the competences required for the job. > Through regular feedback on the monitoring results, the results of internal audits, and OH&S performance and toolbox measurements, the awareness is 'maintained'. > The policy states that the staff must address each other's behaviour directly in relation to the OH&S risks and obligations. > The management indicates the importance of the OH & S policy by expressing and communicating the importance of achieving the OH&S objectives in the communication. <p>The level of awareness is derived from an analysis of deviations and near-deviations, from the frequency with which it is necessary to address one another regarding attitude and behaviour, from the results of internal audits and inspection rounds.</p>
7.4 Communication	<p>Keizer's Pet Foods has made an analysis of the necessity for communication. In the past, the company communicated both internally and externally, usually on a more or less ad hoc basis. In order to comply with the ISO 45001:2018, communication has been given a more systematic approach.</p> <p>Fixed moments have been set for the internal communication (by means of an overview of the OH&S performance and the current situation of improvement projects). These are discussed in departmental meetings and with the Works Council four times per year.</p> <p>The context analysis has revealed that a number of stakeholders (in particular the cleaning company, the occupational health and safety service, and the emergency services) need regular communication (not only when a problem occurs). In any case, communication with these parties takes place once a year.</p>

8.1 Operational planning and control	<p>To enable compliance with the ISO 45001:2018 requirements, Keizer's Pet Foods has made two changes to the operational planning and control.</p> <p>In order to better anticipate planned and unplanned changes, an analysis was made to locate these changes within the organization. Some of these changes were found in:</p> <ul style="list-style-type: none"> > the purchase of new materials of which the composition has been altered; > changes in process equipment, process conditions, process execution; > modifications or extension of buildings; > engineering projects. <p>The responsibilities for the MoC processes are defined in the job descriptions. These are registered.</p> <p>On the basis of the adjusted OH&S risk register, agreements have been made for a number of OH&S risks that arise during cleaning and maintenance, and/or with partners to whom activities have been outsourced. In this context, agreements have been made with, among others, the transport and the cleaning companies working with Keizer's Pet Foods. These are contractually agreed, and the agreements are met.</p>
9.1 Monitoring, measuring, analysis and evaluation	<p>Contrary to the former standard, the organization must always be aware of its compliance status (whether all compliance requirements are met). To adequately comply with this requirement, Keizer's Pet Foods has determined a control frequency for each compliance obligation, ranging from:</p> <ul style="list-style-type: none"> > 1x per 2 months (requirements with a higher change of deviation and risk); > 1x per year; > 1x per 3 years (for more 'static' obligations, such as building-related requirements that only change with renovations). <p>The frequency of the controls was determined on the basis of a risk analysis. Department-specific overviews of requirements are drawn up per department, and results are compiled by the QHSE coordinator each quarter.</p> <p>The QHSE coordinator is immediately informed of deviations that cannot be corrected right away.</p> <p>This provides an up-to-date overview of the compliance status.</p> <p>The measures taken, and the research carried out, are related to the OH&S risks of Keizer's Pet Foods. This also includes periodic inquiries among the staff (such as periodic occupational health examinations and the safety culture). In order to meet the requirement for delivering reliable, reproducible and traceable results, there is an overview of records and measurements that have to be kept up-to-date, indicating the risk with respect to reliability and reproducibility (this is not explicitly required according to ISO 45001:2018). These risks are covered by measures or agreements. Where necessary, measurement protocols are in place to ensure reliable results.</p>
9.3 Management review	<p>Previously, Keizer's Pet Foods' management review was an annual assessment, mostly carried out by the QHSE coordinator. The report was discussed in the MT. In order to comply with the new standard, the execution of the OH&S policy is now on the managements' agenda every quarter. To this end, Keizer's Pet Foods has created a format incorporating the recorded OH&S risks and the progress of the OH&S objectives. Accidents, dangerous situations and identified deviations from compliance with legislation and regulations are also discussed, and measures are taken where necessary.</p> <p>At the close of the year, there is a final assessment that includes subjects that do not return every quarter. These concern, among other things, the current situation with regard to culture. The output of the system is also assessed in the light of the results of the context analysis and any changes thereto. Based on the management review, the (strategic) policy is reviewed and new objectives are formulated.</p>

10 Continuous improvement	Keizer's Pet Foods maintains a list with all the improvement measures. Each improvement measure indicated the targeted objective/OH&S risk. The improvement of the culture can also be an objective of an improvement measure. Each measure also indicates whether it is being addressed, when it must be ready, and who is responsible for it. The origin of the improvement measure and possibly a reference to a report or other document is included. If necessary, the measures in the quarterly assessment are ratified by the management (for example, when time and resources are required, or when measures relate to identified risks and opportunities or to the strategic policy). Measures that do not have priority, but must not be forgotten, are noted and scheduled for later review. The list is managed by the QHSE coordinator who makes it a living document that is continually updated and in which improvements can be marked as 'achieved'.
------------------------------	---

Contact

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.

Mijn.sccm is *the* knowledge platform for ISO 14001, ISO 45001 and OHSAS 18001. On mijn.sccm, you'll find a wealth of information including summaries of the most relevant (Dutch) environmental and OH&S legislation and regulations, and semi-annual overviews of updates to legislation and regulations (all summaries in Dutch). Click on mijn.sccm.nl and sign up!

Stichting Coördinatie Certificatie Milieu- en arbomanagementsystemen (SCCM)

P.O. Box 13507
2501 EM Den Haag
T +31 (0)70 362 39 81
E info@sccm.nl
I www.sccm.nl

Published by SCCM, The Hague, The Netherlands, 13 March 2018