

OHSAS 18001:1999 BECOMES BS OHSAS 18001:2007

A SUMMARY OF AMENDMENTS AND UPDATES APPLIED TO OHSAS 18001:1999

The latest edition of the management systems standard OHSAS 18001 has recently been published and adopted as a British Standard, BS OHSAS 18001:2007. Used in over 80 countries, with 16,000 certified organizations, OHSAS 18001 is recognized as the leading Occupational Health and Safety (OH&S) Management System standard in the world.

This document aims to highlight the improvements in the updated standard and what these will mean in practice for your organization. It also provides advice on how to implement the amendments and includes an appendix detailing the significant changes clause by clause. Please read this summary in conjunction with the new standard which you can obtain from your local BSI office or by visiting: www.bsiamericas.com/ohstandards

The international community of health and safety practitioners has worked through the OHSAS Project Group since February 2006 to improve OHSAS 18001:1999. The result is a new standard that enhances OH&S risk management, places more emphasis on "health"

rather than just "safety", is more logical, aligns more closely with ISO 14001:2004 and is more compatible with ISO 9001:2000. OHSAS 18001:2007 simplifies the development of an integrated health, safety, environment, and quality management system consistent with PAS 99.

OHSAS 18001:2007 represents such an improvement that it has been adopted with no modification as a British Standard. While the clauses of the standards are identical, there is a national foreword in BS OHSAS 18001:2007.

If your organization is already certified to OHSAS 18001:1999 or is in the final stages of certification, a two year transition period has been agreed to allow you the time to make the change to the new standard. The transition period will end on July 1st 2009.

What it means to you

In summary, new and revised definitions have been included to clarify the scope of the OH&S Management System. In aligning the standard more closely with ISO 14001:2004 and ISO 9001:2000, the language throughout makes the detail more explicit, such as the use of "establish, implement and maintain."

You will need to consider a broader range of circumstances, like the influence of human behavior and hazards originating externally; for example from neighbors.

The importance of good planning has been emphasized within the standard with the inclusion of the management of change and more specific detail for risk assessment.

Your risk assessments will now need to demonstrate adherence to the new hierarchy of controls and show that these controls are taken into account within the OH&S Management System.

There is more focus on the analysis of training needs and measurement of the effectiveness of the training given. The section on consultation and communication now highlights the importance of communicating on health and safety matters. This emphasizes the need for worker participation as essential to an effective OH&S Management System.

The requirements for checking now include monitoring the effectiveness of OH&S risk controls, evaluation of compliance, expanded incident investigation and subsequent risk assessments.

There is now a prescriptive list of inputs and outputs in the management review clause.

New annexes have been added; Annex A shows the correspondence between the new standard, ISO 14001:2004 and ISO 9001:2000. Annex B shows the correspondence between the new standard, OHSAS 18002 and the ILO-OSH:2001 Guidelines on OH&S Management Systems.

Steps to transition

The first step in migrating to the new standard should be to understand the differences from the old one, then to verify current practices in place and identify any potential gaps. Then you will be able to categorize and prioritize the actions you need to take for successful transition and begin communicating them to your organization. You should aim to have implemented all the necessary changes so that evidence of their application can be assessed before certification by the July 1st 2009 deadline.

We will work with you to guide you through the transition process. When you are ready, a phased transition assessment will be conducted at no extra costs as part of the normal continuing assessment process. If you need more support, additional gap analysis days can be booked through your client manager and local office.

BSI Learning courses have been updated in line with the new standard to help you and your colleagues develop and maintain the right skills and knowledge. For more information on courses near you please visit:

www.bsiamericas.com/training

The more sites you are managing the more likely it is that the BSI Entropy software will be able to provide an efficient platform on which to run your OH&S Management System, for more information on this please visit:

www.bsiamericas.com/entropy

OHSAS 18001:1999 clause number	BS OHSAS 18001:2007 clause number	Comments and interpretation of changes and differences
1 Scope	1 Scope	Changes <i>OH&S risks</i> to <i>OH&S hazards</i> . Adds new sub-items 1-4.
2 Reference publications	2 Reference publications	Limits the list to purely international documents OHSAS 18002 and ILO-OHS:2001.
3 Terms and definitions	3 Terms and definitions	
3.1 Accident	3.1 Acceptable risk	Absorbs the definition of accident into incident (3.9). Changes <i>tolerable risk</i> (was 3.17) to <i>acceptable risk</i> .
3.2 Audit	3.2 Audit	Reflects ISO 9000:2005, 3.9.1. Clarifies the definition of <i>independent</i> with particular relevance for smaller organizations.
3.3 Continual improvement	3.3 Continual improvement	Adapts from ISO 14001:2004, 3.2 to clarify the definition.
–	3.4 Corrective action	Adds this new definition to bring into line with ISO 9000:2005, 3.6.5 and contrasts with new definition 3.18 on <i>preventive action</i> .
–	3.5 Document	Adds this new definition to bring into line with ISO 14001:2004.
3.4 Hazard	3.6 Hazard	Modifies previous definition removing reference to “damage to property and the workplace environment” and includes cross reference to new definition of <i>ill health</i> (3.8).
3.5 Hazard identification	3.7 Hazard identification	Moves to a new number.
–	3.8 Ill health	Adds this new definition, which is more prescriptive for conditions that are <i>identifiable</i> .
3.6 Incident	3.9 Incident	Changes the definition to emphasize the work related nature of the event (not the injury). Includes cross reference to <i>ill health</i> (3.8) potentially prompting a re-think of the range of potential risks. Includes new notes, one of which defines <i>accidents</i> , <i>incidents</i> , and <i>emergency situation</i> (4.4.7) as a particular type of incident.
3.7 Interested parties	3.10 Interested party	Modifies the definition clarifying that <i>interested parties</i> can be inside or outside the workplace.
3.8 Non-conformance	3.11 Non-conformity	Revises definition and modifies clause name to make more generic in line with (ISO 9000:2005, 3.6.2; ISO 14001:2004, 3.15).

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3.10 Occupational health and safety	3.12 Occupational health and safety (OH&S)	Adds reference to include factors that could affect the health and safety (not <i>well-being</i>) of the workers. Adds explicit note on referencing legal requirements of certain organizations towards “persons beyond the immediate place of work, or who are exposed to the workplace activities.”
3.11 OH&S management system	3.13 OH&S management system	Restructures this definition in line with ISO 14001:2004.
3.9 Objectives	3.14 OH&S objective	Restructures this definition and adds a note.
3.13 Performance	3.15 OH&S performance	Refers to “measuring the effectiveness of controls,” which will require more consideration. Adds Note 2 containing other OH&S performance requirements.
–	3.16 OH&S policy	Adds a new definition bringing in line with ISO 14001:2004 and is more specific for top management.
3.12 Organization	3.17 Organization	Changes slightly to bring in line with ISO 14001:2004. Adds new definition to bring in line with ISO 9000:2005 and describes relation to a corrective action.
–	3.18 Preventive action	Adds new definition to bring in line with ISO 9000:2005 and describes relation to a corrective action.
3.14 Risk	3.21 Risk	Expands definition to be more detailed on specifics of risk related to OH&S management. Brings in the term <i>exposure</i> . Specifies “severity of injury or ill health” instead of <i>consequences</i> .
3.15 Risk assessment	3.22 Risk assessment	Words this definition more objectively: “taking into account the adequacy of any existing controls,” causing more focus on the judgement of the effectiveness of controls as in 3.15 <i>OH&S performance</i> .
3.16 Safety	–	Removes this definition.
–	3.23 Workplace	Adds new definition.
4.1 General requirements	4.1 General requirements	Adds <i>document, implement</i> and <i>continually improve</i> . Adds that the organization shall “determine how it will fulfil these requirements,” and “define and document the scope of its OH&S management system.”

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4.2 OH&S policy	4.2 OH&S policy	<p>Restructures the requirement, specifying that top management define, not just authorize the OH&S policy.</p> <p>Broadens employees to include all persons working for or on behalf of the organization.</p>
4.3.1 Planning for hazard identification, risk assessment and risk control	4.3.1 Hazard identification, risk assessment and determining controls	<p>Restructures the requirement with the addition of a hierarchy of risk reduction measures.</p> <p>Adds <i>determining controls and implement</i>.</p> <p>Requires consideration of the influence of human behavior on hazard identification and risk assessment (c), and consideration of hazards originating externally and in the vicinity with impacts on persons under control of the organization. The size of impact of this will vary depending on the context of the organization.</p> <p>Requires consideration of organizational change, change in business activity or materials, changes to the OH&S management system (temporary or permanent) and their subsequent effects.</p> <p>Requires consideration of legal obligations relating to risk assessment and implementation of control measures.</p> <p>Requires consideration of “work areas, processes, installations, machinery/equipment, operating procedures and work organization, including their adaptation to human capabilities.”</p> <p>Inserts a new piece on change management requiring the organization to “identify the OH&S hazards and OH&S risks associated with changes in the organization, the OH&S management system, or its activities, prior to the introduction of such changes.”</p> <p>Requires the organization to consider how to eliminate hazards, then consider substitution and move on through the hierarchy supported by objective evidence to substantiate that the decision making process has been followed. For example you should not be considering personal protective equipment as the first option.</p>
4.3.2 Legal and other requirements	4.3.2 Legal and other requirements	<p>Requires that legal and other requirements are taken into account in establishing, implementing and maintaining the organization’s OH&S management system.</p>
4.3.3 Objectives	4.3.3 Objectives and program(s)	<p>Merges requirements 4.3.3 and 4.3.4 from the old specification together into one requirement to better reflect ISO 14001:2004.</p> <p>Adds requirement for measurability of objectives.</p> <p>Adds requirement for commitment to the prevention of injury but also ill-health.</p> <p>Emphasizes the organization’s obligation to comply with legal and other requirements.</p>

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4.3.4 OH&S management program(s)	-	Merged with clause 4.3.3 above, there is no 4.3.4 in BS OHSAS 18001:2007.
4.4.1 Structure and responsibility	4.4.1 Resources, roles, responsibility, accountability and authority	<p>Renames the clause "Resources, roles, responsibility, accountability and authority" which emphasizes top management responsibility and accountability.</p> <p>Specifies that a member of top management will be responsible for health & safety adding a new note stating that top management may delegate duties but not accountability.</p> <p>Requires that access to the top management appointee is available to all persons working under control of the organization.</p> <p>Emphasizes that persons in the workplace shall take health & safety responsibility over which they have control. The organization shall ensure that this happens.</p>
4.4.2 Training, awareness and competence	4.4.2 Competence, training and awareness	<p>Strengthens the obligation for the organization.</p> <p>Specifies training needs analysis, meeting of the subsequent requirements, evaluation of its effectiveness and record keeping.</p> <p>Broadens <i>employee</i> to include "persons working under control of the organization" which could have significant impact to costs and scope of training.</p> <p>Adds behavior, broadening the scope of activities from purely work related.</p>
4.4.3 Consultation and communication	4.4.3.1 Communication	Requires active internal communication (regardless of level or function) in the organization, communication with visitors and contractors, and a new procedure for managing interested party communications (both incoming and outgoing).
-	4.4.3.2 Participation and consultation	<p>Broadens scope and clarifies the need for worker participation in hazard identification, risk assessments and determination of controls, plus incident investigation. The new text also extends the need for worker participation in the development and review of OH&S policies and objectives, consultation where there are any changes that affect their health & safety, and representation on OH&S matters.</p> <p>Requires the communication of participation arrangements with workers, consultation with contractors and active engagement of relevant external parties.</p>

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4.4.4 Documentation	4.4.4 Documentation	<p>Restructures this section for clarity and lists specific documents required including: policy and objectives, scope description for the OH&S Management System, documents required by the OH&S Management System, and specifies records.</p> <p>Requires documents & records necessary for planning, operation and control of processes relating to the control of OH&S risks.</p> <p>Expands the note to include reference to appropriate coverage of documentation commensurate with level of hazards, risks and complexity.</p>
4.4.5 Documents and data control	4.4.5 Control of documents	<p>Amends title to remove <i>data control</i> which is no longer necessary because of definition of document in 3.5.</p> <p>Restructures section for greater clarity and adds some requirements specifying control of records by adding requirements to track changes and revision status of documents, good condition of documents, identification and control of relevant externally generated documents.</p>
4.4.6 Operational control	4.4.6 Operational control	Restructures this section for clarity with little material change.
4.4.7 Emergency preparedness and response	4.4.7 Emergency preparedness and response	Rewords this section without significant change and adds consideration of external parties' needs in planning and testing.
4.5 Checking and corrective action	4.5 Checking	Rewords this section without significant change and adds the requirement to monitor the effectiveness of controls.
4.5.1 Performance measurement and monitoring	4.5.1 Performance measurement and monitoring	Moves "applicable legislation and regulatory requirements" to new clause 4.5.2.
–	4.5.2 Evaluation of compliance	Sub-divides and adds explicit clause on evaluation of compliance to legal and subscribed requirements and the keeping of records of these evaluations to align with ISO 14001:2004.
4.5.2 Accidents, incidents, nonconformances and corrective and preventive action	4.5.3 Incident investigation, nonconformity, corrective action and preventive action	Sub-divides this clause dealing separately with incidents and nonconformities, corrective action and preventive action. Your organization may need to define a procedure on how to investigate incidents to meet with these more explicit requirements.

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-	4.5.3.1 Incident investigation	Specifies analysis of incidents and provides a list of the actions that will need to be taken, for example communication of the results of investigations. References 4.5.3.2 for instruction on dealing with required corrective and preventive action.
-	4.5.3.2 Nonconformity, corrective and preventive action	Adds this new sub-section which now clarifies the actions to be taken to avoid occurrence and recurrence of nonconformities. Adds a new paragraph requiring risk assessments to be repeated prior to the proposed corrective and preventive actions being implemented.
4.5.3 Records and records management	4.5.4 Control of records	Retitles and rewords this section to simplify the control of records. Adds a requirement for the disposal of records to be included in a procedure.
4.5.4 Audit	4.5.5 Internal audit	Improves the structure of the clause with some rewording but actual content changes little.
4.6 Management review	4.6 Management review	Restructures section to provide a more specific list of inputs to be considered and outputs provided to ensure a more effective management review. Specifies evaluation of legal compliance by top management. Requires the review of results of broader participation and consultation with external parties. Requires assessment of the extent to which objectives have been met. Lists outputs from decision making at management review and specifies the need for these to be made available for communication and consultation.

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