

ELEMENT – 5 HEALTH AND SAFETY MANAGEMENT SYSTEM – ACT

- 5.1 Explain the purpose of, and procedures, for health and safety auditing.
- 5.2 Explain the purpose of, and procedures for, regular reviews of health and safety performance.

5.1 INTRODUCTION

Unless an organisation attempts to measure its safety performance, it will not be able to assess whether the systems and procedures it has in place are working or need to be amended, altered or updated in any way. There are a variety of different activities which can be undertaken to measure health and safety standards. These can be sub-divided into active (proactive) systems which monitor whether standards and objectives are being met and reactive systems which monitor accidents, ill-health and incidents.

Before looking at different measures to check the effectiveness of a safety management system it is worth considering how any data will be collected. There are three main ways of collecting data for monitoring purposes they are by:

- Observations (including workplace inspections)
- Interviewing and talking to employees
- Reviewing documentation and records

5.2 REVIEWING HEALTH AND SAFETY PERFORMANCE

Audits and reviews are a means of measuring company systems and procedures. This involves looking at the entire safety management system rather than checking hazards within the workplace. A health and safety audit is a systematic and critical appraisal of the SMS.

"Organisations can maintain and improve their ability to manage risks by learning from experience" HSG65

Reviews are normally internally led, they assess judgements on performance and the taking of decisions about safety related problems. They may use findings from audits/ inspections, as well as bench-marking against legislation and best practice standards. They should enable the organisation to receive feedback on success and failures, this is a continuous process. It should also include the formal review of documents such as risk assessments and is normally completed internally at regular planned intervals. They should assess opportunities for improvement and identify the need for change e.g. as a result of new legislation or guidance.

Reviews should consider:-

- Legal requirements and changes in legislation
- Internal standards in the H&S policy and SMS
- Relevant BS or international standards (if checking against an accredited SMS)
- Data to be reviewed:
- Accident and incident data
- Corrective actions taken after accidents and risk assessments
- The results of inspections, audits, tours and sampling
- Absence levels
- Sickness from occupational ill-health

- quality assurance reports
- the results of external audits
- external complaints
- results of participation e.g. H&S committee minutes
- objectives and targets – have they been achieved?
- The minutes of any management reviews and if actions highlighted have been completed

Management review

A management review will normally be held at least annually to review the SMS to ensure its continuing suitability for the needs of the business and its adequacy and effectiveness. The management review meeting should also set and review progress on health and safety targets and objectives. A summary of the results of the internal audits, inspections and other monitoring results will be provided. The management board should review this information and agree corrective action on current deficiencies. It will use this information to set the priorities for the following year. (Note there is no legal requirement for a management review but it would normally form part of the Arrangements section of the H&S policy. But they are mandatory if the company has an accredited SMS such as ISO 45001 or OHSAS 18001).

The management review should be attended by senior managers and minutes of the discussion taken (based on ISO 45001).

A typical agenda will always include the following items:

- Review of actions raised at the previous meeting
- Review environmental performance (audit results/ non-conformances / incidents/ site inspections/external audits)
- Confirmation of preventative actions required to rectify issues raised
- Review of progress towards targets and objectives
- Review of policy statement
- Review of SMS (to ensure still applicable to business)
- Review of key risks
- Setting of new targets
- Improvement action plans – for the business and different departments where applicable
- Review of health and safety training
- Changes to the circumstances including developments in legal and other requirements
- Confirmation of legal compliance

An additional management review may be held at any time there are special circumstances, which may include restructuring of operations, management responsibilities, new processes, significant health or safety issues, major concerns or issues relating to legal obligations.

Reporting on H&S performance

The senior management of any organisation should receive regular reports on health and safety, this may be done at formal monthly/quarterly management meetings or completed

via the production of a written report. The type of issues which should be reported upwards include:

- Accident trends
- Details of RIDDOR reports
- Details of enforcement action or advice
- Days lost due to accidents and occupational ill-health
- Details of civil claims
- Changes to health and safety legislation
- Key risks and outstanding issues
- Results of the H&S committee meeting

The reason for reviewing the effectiveness of a health and safety management system is to identify the weaknesses and strengths, opportunities for improvements and to review whether the standards expected are being met. Formal accredited safety management systems require management reviews to demonstrate that the senior management of the company are actually committed to meeting health and safety standards. They must also give a commitment to ensuring legal compliance and continual improvement.

5.3 HEALTH AND SAFETY AUDITS

"Structured process of collecting independent information on efficiency, effectiveness and reliability of H&S management system and drawing up plans for corrective action"

"Structured process of collecting independent information"

"Assessing the reliability of a H&S management system and developing plans for improvement"

"Systematic critical examination of a health and safety system to identify its strengths and weaknesses"

Health and safety audits are used to evaluate the effectiveness of an organisation's health and safety policies, procedures, objectives and training programmes. The audit should highlight areas of best practice as well as areas of weakness which need to be addressed.

The audits will normally be conducted by a small group of people. It should aim to focus on the positive aspects and not just be a fault-finding exercise. The audit should be designed to highlight any deviations from the standards required and to facilitate the analysis of these deviations. These should then be used to promote an improvement in safety standards. The audit will normally review legal compliance and also consider the effectiveness of all stages of the SMS. Accredited safety management systems such as ISO 45001 require the audit to review all the specific clauses within the standard to ensure they are all being met.

Auditing helps to determine whether the planned elements of the SMS are being implemented as intended and that the SMS is functioning as planned. It also provides information to management on the overall performance of the system. They can be carried out by internal or external auditors.

There are many definitions of the term 'audit', although it may generally be described as a structured process of collecting independent information on the efficiency, effectiveness

and reliability of the total risk management system and drawing up plans for corrective action.

In practice, an audit is a check against a previously agreed set of standards and an assessment of the extent to which these standards are being met. It is often the case, however, that the essential step of establishing the standards against which to make an assessment is often missed by organisations when it comes to safety and environmental auditing. Auditors may conduct an H&S audit without any in-house standards, however, they audit with reference to:

- Relevant legislation – this is the so-called legal compliance audit. Whilst it may (if conducted properly) indicate to an organisation whether or not they are complying with current legislation, it is somewhat limited, since legislation itself only sets a minimum standard
- Good practice – here the standard against which the organisation is judged is industry good practice guidance.

However, it should be considered that in the purest form of audit, the organisation will have its own performance standards against which to be assessed, and these will of course encapsulate elements of both legislation, ACoPS, guidance and the industry best practice.

The audit may include an analysis of:-

All parts of the SMS and H&S policy (all 3 sections)

- Accident trends
- Remedial action taken as a result of an accident
- Risk assessment – control measures
- H&S training
- Manager commitment
- Equipment standards
- Workplace standards
- Effectiveness of accident reporting systems
- Whether safety rules are being met
- Emergency plans & procedures

Assessment of findings

Within the SMS internal audit the assessment of findings is typically aimed at:

1. Identification of non-conformance
2. Identification of appropriate corrective action
3. Identification of good practice that should be communicated throughout the organisation
4. Recommendations for actions to achieve performance improvement/risk reduction

Sample audit standard proforma

		Yes	No	Score	Actual Score
	HEALTH & SAFETY POLICY				
1.	There is a H&S policy statement, signed and dated in the last two years.			5	
1.1	There are clear organisational structure and responsibilities included in the policy.			5	
1.2	A full set of practical arrangements are included or are associated with the H&S policy.			10	
1.3	There is evidence that the policy is communicated to all new staff.			10	
1.4	There is evidence that the policy is communicated to all existing staff on a regular basis.			10	
1.5	There is evidence that those with responsibilities in the policy are aware of these responsibilities and know the action they must take.			5	
1.6	There is a formal process for the review of the policy.			5	
1.7	There is evidence of a process to consult with staff on health and safety matters			5	

5.3.1 Planning an Audit

Prior to completing an audit, a range of factors need to be considered at the planning stage.

- What is to be audited - is it to company standards or a formal standard?
- Is the audit to be completed on all levels of the organisation or just a sample of departments
- Timescales and frequency
- Who needs to be involved?
- Who is going to complete the audit? Will they need additional training?
- How is the audit to be recorded? Manually or is a software based system to be used. How are the results to be presented?
- Equipment and PPE needed
- How data is to be gathered? – will you be looking at records, carrying out observations and interviews
- Communication – to let people on site know.

5.3.2 Who Is The Auditor?

As we have seen audits may be completed by internal or external auditors, list the advantages and disadvantages of each.

Internal Auditor	External auditor
Advantages	Advantages
Knows the systems and people	Higher degree of competence and awareness of other industries and companies
Disadvantages	Disadvantages
May be subject to peer pressure	Costly

5.3.3. Health and Safety Inspection or Audit?

Consider the difference between an audit and inspection

Audit	Inspection
Objective view – external auditor or internal auditor specifically trained to be objective	Usually completed internally, may check all or part of the workplace or just focus on one H&S issue.
Reviews the whole SMS and legal compliance	The focus is on workplace and work activities
Paperwork and documentation based (will check on the results of inspections)	Focus on the H&S issues which can be seen in the workplace (hazards and risks)
Takes longer to complete	Quicker
Less frequently carried out	Completed more often
Group approach	May be completed by employee, manager or H&S advisor
Higher degree of competence	Lower competence level
Audit against set standards	May use checklist to assist