

Health and Safety Management Systems

An effective health and safety management system is absolutely fundamental to managing the risks faced by employers in protecting their stakeholders - and themselves.

Successful occupational health and safety management needs to be active rather than proactive. The reactive approach often leads managers to focus on the specific failure and not the underlying causes. Accidents/incidents are rarely caused by one failure, but are generally due to a series of linked failures that are eventually triggered by a specific event. This indicates occupational health and safety management should be integrated into all parts of an organisation, with employees and other stakeholders (the self-employed, contractors, etc) encouraged to take an active part in improving health and safety at work.

Health and Safety Management Systems

An occupational health and safety management system is defined as 'part of the overall management system that facilitates the management of the occupational health and safety risks associated with the business of the organisation. This includes the organisational structure, planning activities, responsibilities, practices, procedures, processes and resources for developing, implementing, achieving, reviewing and maintaining the organisation's occupational health and safety policy'.

Integrating health and safety objectives into an organisation's overall management system is now widely recognised as the most effective way of reducing risks and improving performance.

There are three drivers for effective health and safety management:

- the moral imperative to do the right thing
- the financial objective to reduce avoidable losses, including lost opportunities
- the legal obligation to comply with statutory provisions, any failure of which is likely to lead to prosecution or other legal action such as civil claims for damages following accidents or incidents in the workplace.

In discharging their legal obligations, employers are under a duty to prepare a Health and Safety Policy specific for their organisation and written where they have five or more employees. The objective in preparing the document should be to provide a clear explanation as to who does what, when and how in relation to workplace health and safety. Please refer to separate guidance note on this subject.

This guidance talks a lot about what directors and boards should do, but many small organisations will not have either directors or boards. If you are the owner or partner of such an organisation, you are strongly advised to follow this guidance – it is easiest to interpret references to what boards and directors should do as referring to what 'you' should do.

Published Systems

BS 18004 is one of three related documents on occupational health and safety management systems published by the BSI since June 2007. The first was BS OHSAS 18001:2007, which specifies what an organization needs to have in place to meet the criteria for occupational health and safety management.

BS OHSAS 18001 is supported by BS OHSAS 18002:2008, which gives guidance on what an organisation should consider when implementing and operating a system that meets the requirements of BS OHSAS 18001.

BS 18004:2008 gives good practice guidance on successful health and safety management, and builds on the guidance advocated in HSG 65 (the Health and Safety Executive's guidance book "Successful Health and Safety Management"). Structured around the OHSAS 18001 framework, it provides guidance in line with developments in OHS management within the UK and provides extensive annexes intended to support those organizations that wish to deliver good health and safety performance.

System Elements

Organisations wishing to review their management systems may find these headings helpful:

- policy development: initial review, look at where you are starting from.
- planning: senior management responsibilities and resource allocation, how you will manage health and safety, check the plan with your staff
- deliver: operation and document control, risk assessments, records, training, communication and reporting, use competent advisors
- monitoring and action: monitoring, evaluation, team meetings/toolbox talks corrective action and auditing.
- review performance - take stock of how you are doing on a regular basis, including when any serious incident occurs

Safety Culture and Policy

Behind every successful health and safety management system there exists a positive safety culture and active consultation programme. The organisation should strive for continual improvement and the health and safety management system comprises five main steps:

- an occupational health and safety policy
- planning
- implementation and operation

- checking and corrective action
- management review

Senior management must be committed to improving health and safety, and the organisation's safety policy should be:

- available to interested bodies
- committed to complying with relevant occupational health and safety legislation and other relevant standards
- committed to continual improvement
- documented, implemented and maintained in a suitable medium (paper or electronic)
- pertinent to the nature and level of the occupational health and safety risks
- publicised among all employees so they become aware of their occupational health and safety duties and rights
- regularly reviewed to ensure it is up-to-date

The organisation should also create and maintain plans to identify the potential for, and responses to, incidents and emergency situations, as well as preventing and mitigating potential illnesses and injuries. These plans should be regularly reviewed, particularly after incidents.

Documented Objectives

The organisation should devise and maintain documented occupational health and safety objectives for each level of the organisation. An implementation programme which details responsibilities, authorisations, how objectives will be achieved and within what timescales is also required. Two members of senior management should be given overall responsibility for ensuring the occupational health and safety management programme is implemented throughout the organisation.

The programme should be regularly reviewed and amended as necessary. The roles, responsibilities and authorities of anyone who impinges on the organisation's health and safety risks should be defined, documented and communicated. As well as identifying the human resources, adequate financial and other resources must also be provided to achieve the objectives.

Procedures should be developed and maintained for setting responsibilities and authority for:

- handling and investigating accidents, incidents and occurrences of non-conformance
- taking action to mitigate any subsequent consequences
- initiating and completing corrective or preventive actions, and confirmation of their effectiveness.

Competency

Staff should be competent (defined in terms of specific training and/or experience) to undertake any jobs that affect occupational health and safety. All employees should be aware of the importance of complying with health and safety policies and procedures, especially in terms of the:

- potential/actual health and safety affects of their work activities

- benefits of improved personal health and safety performance
- potential outcomes of failing to meet safe operating procedures

Training should take account of responsibilities, abilities, levels of literacy, and the risk which is being eliminated or controlled.

Consultation and Communication

Employees should be:

- consulted on changes in the workplace that affect health and safety
- informed of occupational health and safety issues
- informed who their safety representatives are
- involved in the development and review of appropriate policies and procedures
- represented on health and safety issues

Performance Review

Occupational health and safety performance and procedures should be regularly monitored, either qualitatively or quantitatively, to determine whether health and safety objectives are being met, and the management programme is achieving compliance. Monitoring results should be recorded and action taken to correct any deficiencies. Monitoring equipment should be calibrated and maintained as appropriate, and records kept.

When it deems it appropriate, senior management should review the occupational health and safety management system to ensure that it remains suitable, adequate and effective.

Two checklists are available for use in assessing compliance with a range of health and safety requirements. These are contained in the document library – Performance Measurement – management and Performance Measurement – Physical.

Record Keeping

Procedures for identifying, maintaining and disposing of occupational health and safety records, including audits and reviews, should be developed and maintained. Such records should be legible, identifiable and traceable to the relevant activity and they should be stored and kept so that they may easily be retrieved, and protected against damage, deterioration or loss. Periods of retention should be recorded - six years (in line with the statute of limitations) is a good guideline.

Audit

Organisations should develop and maintain an audit programme which determines whether the occupational health and safety management system meets OHSAS 18001 specification, is correctly

implemented and maintained and meets the organisation's policy and objectives. Audits should review the results of previous audits and management should be supplied with the results. Where possible, audits should be undertaken by persons independent of the activity being audited.

OVERVIEW

- How do you demonstrate the board's commitment to health and safety?
- What do you do to ensure appropriate board-level review of health and safety?
- What have you done to ensure your organisation, at all levels including the board, receives competent health and safety advice?
- How are you ensuring all staff – including the board – is sufficiently trained and competent in their health and safety responsibilities?
- How confident are you that your workforce, particularly safety representatives, are consulted properly on health and safety matters, and that their concerns are reaching the appropriate level including, as necessary, the board?
- What systems are in place to ensure your organisation's risks are assessed, and that sensible control measures are established and maintained?
- How well do you know what is happening on the ground, and what audits or assessments are undertaken to inform you about what your organisation and contractors actually do?
- What information does the board receive regularly about health and safety – e.g. performance data and reports on injuries and work-related ill health?
- What targets have you set to improve health and safety and do you benchmark your performance against others in your sector or beyond?
- Where changes in working arrangements have significant implications for health and safety, how are these brought to the attention of the board?

References

Available from HSE Books (telephone: 01787 881165):
HSG65 Successful Health and Safety Management ISBN 0717612767
Health and Safety Training INDG 345
Managing Health and Safety: Five Steps to Success INDG275
Leading Health and Safety at Work INDG417

Available from BSI (telephone: 020 8996 9001):
BS OHSAS 18001 Occupational Health and Safety Management Systems – Requirements

BS OHSAS 18002 Occupational Health and Safety Management Systems – Guidelines for the Implementation of BS OHSAS 18001
BS 18004 Guide to Achieving Effective Occupational Health and Safety Performance