

Clause 1: Scope This clause relates to the scope or coverage of the standard to help organizations achieve the intended outcomes of its OH&S Management System.

Clause 2: Normative reference There are no normative references, for example other additional requirements in other standards, that have to be considered. The clause is retained in order to maintain the same numbering scheme as all the other management system standards.

Clause 3: Terms and definitions at first sight, the listing of terms and definitions seems confusing as they are not in alphabetical order. Instead, the approach stipulated by ISO is that terms and definitions are in the order that they appear in the standard. It may be easier to use this listing in conjunction with the alphabetical listing in Annex C.

An organization will also need to identify the 'interested parties' relevant to their OH&S Management System and their needs. These could include workers, contractors, customers, communities, suppliers and non-government organizations and may change over time. Finally, the last requirement is to establish, implement, maintain and continually improve the OH&S Management System in accordance with the requirements of the standard.

High-Level Structure (HLS)

1 | Scope

2 | Normative references

3 | Terms and definitions

4 | Context of the Organisation

5 | Leadership

6 | Planning

7 | Support

8 | Operation

9 | Performance Evaluation

10 | Improvement

Clause 4: Context of the organization

New from OSHAS 18001 but part of the HLS, this clause 'sets the scene' for the organization and the scope and boundaries for the occupational health and safety management system. Importantly ISO 45001 should be aligned to the strategic direction of the organization, embedding OH&S management into the core business functions, rather than as a stand-alone discipline.

Within this clause the organization has to determine the internal and external factors that may affect its ability to achieve the intended outcomes of its OH&S MS. Externally this may be issues such as socio-economic and political instability; internally, it may be issues such as restructuring, acquisitions or new products.

The organization is also required to determine the needs and expectations of 'interested parties' with regard to the OH&S MS. This means that the system cannot operate in isolation – those who have an interest in the outcomes of the OH&S MS – workers, shareholders, legal authorities, contractors etc. have to be considered.

Most organizations will have worked through these two aspects as part as their overall risk and opportunity management (and/or if they have other ISO standards) but it is important for ISO 45001 that these issues are expressly considered against the intended outcomes of the OH&S MS. How could political insecurity or an organizational restructure put workers health and safety at risk? Or provide an opportunity to improve the workplace?

The final scope for the OH&S MS must be documented; this helps to evidence the integrity of the MS. It would be unacceptable to exclude a particular part of the business or site due to poor health and safety performance. Remember the aim for the OH&S MS – to prevent injury and ill-health and provide a safe and healthy workplace. Excluding a particular part of the business

Clause 4	Clause number
Understanding the organization and its contents	4.1
Understanding the needs and expectations of workers and other interested parties	4.2
Determining the scope of the health and safety management system	4.3
Health and Safety Management System	4.4

Clause 5: Leadership and worker participation

This clause is the cornerstone for the success of the OH&S MS. Whilst in OHSAS 18001 top management were responsible for OH&S and were required to 'appoint' a member of top management with specific responsibility for OH&S. Top management in ISO 45001 are responsible and accountable for the prevention of work-related injury and ill health as well as the provision of safe and healthy workplaces (not simply providing support for a management system). This requires top management to be personally involved in order to develop, lead and promote a culture that supports OH&S. It should also be noted that leadership and culture is identified as a potential hazard later in the standard (6.1.2.1a).

It is also top management that has to ensure that a process for consultation and participation with workers is established. This may include establishing a health and safety committee.

It is also top management's responsibility to establish, implement and maintain the health and safety policy. The required contents for the policy are enhanced from OSHAS 18001 and include elements such as a commitment to consultation and participation of workers. Importantly consultation with workers on the health and safety policy is included later in this clause.

Consultation and participation of workers is significantly enhanced from OSHAS 18001 which was limited to participation in hazard identification and consultation on changes. In ISO 45001 consultations involve seeking views before making a decision with clear two-way communication, whilst participation is involvement in decision-making. This must include non-managerial workers.

The organization is now required to provide the mechanisms, time, training and resources for consultation and participation of workers. This includes removing any obstacles or barriers such as language, literacy or fear of reprisals.

Clause 5	Clause number
Leadership (title only)	5
Leadership and commitment	5.1
Health and Safety policy	5.2
Organizational roles, responsibilities and authorities	5.3
Consultation and Participation of Workers	5.4

Clause 6: Planning

Alignment to the HLS structure has seen planning split in a slightly unusual way. There are still the elements that you would expect and know from OSHAS 18001 such as hazard identification, assessment, control, legal requirements and objective setting but the HLS requirements of risk and opportunities introduced a challenge for the expert committee that developed ISO 45001.

- In order to incorporate the HLS and the aim of the OH&S management system, risk and opportunities has been broken into two elements:
- Assessment of OH&S risks and other risks to the management system
- OH&S risks being the 'traditional' likelihood x severity
- Risks to the management system are those more traditionally related to business risk (effect of uncertainty) such as peaks in workflow, restructuring as well as external issues such as economic change
- Assessment of OH&S opportunities and other opportunities to the OH&S management system
- OH&S opportunities are circumstance(s) that can lead to improvement of OH&S performance

This includes adapting work to workers, eliminating hazards and other opportunities for improving the OH&S management system such as implementing ISO 45001. Importantly risks and opportunities shall be determined before planned change.

There is also increased emphasis on identifying hazards associated with mental ill-health (adverse mental or cognitive conditions) such as workload, bullying and the leadership and culture of the organization. Additionally, the identification of hazards has to start at conceptual design stage as well as the on-going lifecycle of workplace, facility, equipment, processes, activity etc. The principles of horizon scanning are also introduced within this clause. New knowledge of, and information about, hazards has to be taken into account.

Clause 6	Clause number
Planning (title only)	6
Actions to address risks and opportunities (title only)	6.1
General	6.1.1
Hazard Identification and the assessment of risks and opportunities	6.1.2
Determination of legal requirements and other requirements	6.1.3
Planning action	6.1.4
Health and Safety objectives and planning to achieve them (title only)	6.2
Health and Safety Objectives	6.2.1
Planning actions to achieve health and safety objectives	6.2.2

Clause 7: Support

This clause begins with a requirement that organizations shall determine and provide the necessary resources to establish, implement, maintain and continually improve the OH&S management system. These cover human resources, natural resources, infrastructure and financial resources. Simply expressed, this is a very powerful requirement covering all OH&S resource needs.

The competency element of this clause is very similar to OSHAS 18001, but communication is split out in ISO 45001 into awareness, communication, internal and external communication.

ISO 45001 uses the term 'documented information', instead of 'documents' and 'records' as used in OSHAS 18001. This reflects modern types and use of information – cloud based, multi-media etc. However, one of the biggest drivers for this change was the recognition that the implementation of OH&S MS's had led to an over reliance on documented procedures, creating unnecessary and bureaucratic paper trails, that did not actually improve OH&S performance.

Clause 7	Clause number
Support (title only)	7
Resources	7.1
Competence	7.2
Awareness	7.3
Communication (title only)	7.4
General	7.4.1
Internal communication	7.4.2
External communication	7.4.3
Documented information (title only)	7.5
General	7.5.1
Creating and updating	7.5.2
Control of documented information	7.5.3

Clause 8: Operation

This clause is significantly enhanced from OSHAS 18001. Not only does it remove the ‘option’ of using the hierarchy of controls, instead making its use a specific requirement, it introduces new sub-clauses on procurement and change.

One of the real strengths of OSHAS 18001 was the explicit recognition that change needed to be taken into account during hazard identification and risk assessment. However, ‘taking into account’ and proactively managing change are very different things. Change presents real risks and opportunities to organizations. ISO 45001 acknowledges this and has a dedicated clause now on the management of change.

Organization will need to plan how to implement change in a manner that does not introduce new (unforeseen) hazards or increase the OH&S risks, whilst also identifying the opportunities for improving OH&S performance that the change may enable.

The new sub-clause on procurement provides recognition that the risks related to the supply chain are most effectively managed when they are taken into account at the very first stages of procurement – pre-tender and tender. Experience has shown that trying to manage the risks introduced by the supply chain once its operational are extremely expensive and limited in effectiveness.

With ISO 45001, organizations have to establish procurement processes that conform to the OH&S MS, including defining OH&S criteria for the selection of contractors. These procurement activities have to be coordinated with those contractors.

New within this section is outsourcing. Relating back to the ‘context’ of an organization and its credibility, there was concern by the expert panel that certain activities or processes with high OH&S risks were being outsourced, without due consideration of the implications for OH&S this had.

A responsible organization will establish control of those outsourced functions to achieve the intended outcomes of the OH&S MS. Controls can include things such as procurement and contractual requirements, training and inspections.

Clause 8	Clause number
Operational planning and control (title only)	8.1
General	8.1.1
Eliminating hazards and reducing health and safety risks	8.1.2
Management of change	8.1.3
Procurement	8.1.4
Emergency preparedness and response	8.2

Clause 9: Performance evaluation

Very similar to OSHAS 18001 in detail, the key change is where in OSHAS 18001 it was a 'procedure', in ISO 45001 it now has to be a 'process'. This is one of the fundamental changes between OSHAS 18001 and ISO 45001. Whilst the introduction of 'processes' is a reflection of the alignment to the HLS; it also reflects that an effective OH&S MS is a continually improving one. A process is a cycle, it should reflect a PDCA (plan, do, check, act) cycle and not be static. Therefore ISO 45001 requires processes for consultation and participation, planning, hazard identification, assessment of risk and operational control.

Management reviews have to consider risks and opportunities and trends in aspects such consultation and participation of workers to ensure it is happening effectively, which is part of their leadership responsibility.

Clause 9	Clause number
Performance and evaluation (title only)	9
Monitoring measuring, analysis and evaluation (title only)	9.1
General	9.1.1
Evaluation of compliance	9.1.2
Internal Audit (title only)	9.2
General	9.2.1
Internal audit program	9.2.2
Management review	9.3

Clause 10: Improvement

Gone from ISO 45001 is the requirement related to 'preventative action' that was found in OSHAS 18001. This is because the whole of ISO 45001 is about prevention. Also, in this clause is the requirement to eliminate the root cause(s) of incidents and non-conformities reflecting the overall aim of the standard to prevent injury and ill-health and provide safe and healthy workplaces.

The standard concludes by underlining the fact that effective OH&S management is not static and should continually improve and be supported by a proactive culture

Clause 10	Clause number
Improvements	10
General	10.1
Incident, non-conformity and corrective action	10.2
Continual improvement	10.3

ISO45001:2018 Clauses 4 to 10

