This gap analysis and transition guide is intended for existing EHQMS customers wanting to make the transition from the requirements of OHSAS 18001 to ISO 45001. The guide gives information that will simplify the implementation.

**Gap Analysis & Transition Guide**

**OHSAS 18001:2007 to ISO 45001:2018**

# Introduction

Although the introduction of ISO 45001:2018 brings a new standard into effect, most of its basic principles are already formulated in OHSAS 18001:2007. The new standard encompasses common occupational safety requirements for management, employees and service providers, including the specific requirements relating to the respective work environment and changes to these requirements.

The focal points of the new requirements to interpret and implement are:

1. 4.1 Context of the organization;
2. 4.2 Interested parties;
3. 6.1.2.1 Hazard identification;
4. 6.1.2.2 Assessment of OH&S risks and other risks to the OH&S management system;
5. 6.1.2.3 Assessment of OH&S opportunities and other opportunities for the OH&S management system;
6. 8.1.2 Eliminating hazards and reducing OH&S risks;
7. 8.1.3 Management of change;
8. 8.1.4.1 Procurement – General;
9. 8.1.4.2 Contractors;
10. 8.1.4.3 Outsourcing.

The degree of change necessary will be dependent upon the maturity and effectiveness of your current management system, organizational structure and operational practices. Therefore, a gap analysis of the new requirements is strongly recommended in order to identify realistic resource and time implications.

Organizations using OHSAS 18001:2007 are recommended to take the following actions:

1. Obtain a copy of ISO 45001:2018 - <https://www.iso.org/standard/63787.html>;
2. Train internal auditors and other key personnel on new standard;
3. Using this document, undertake a gap analysis of the new requirements against the current management system;
4. Develop an implementation plan to fill the gaps that you identified;
5. Align your documentation and processes with ISO 45001 requirements;
6. Update your OH&S policy, objectives, targets and KPIs;
7. Carry out minimal updates to the manual and procedures to include new terminology and key phrases;
8. Ensure that any new competence needs are met and records retained;
9. Create awareness for all parties that have an impact on the effectiveness of the OH&S management system;
10. Verify the effectiveness of the changes to the management system through internal audits, safety reporting metrics, inspections, etc.;
11. As necessary, liaise with your Certification Body for transition certification arrangements.

# Gap Analysis Checklist

## 4.0 Context of the Organization

| **ISO 45001:2018 Clause** | **18001:2007 Clause** | **Evidence/Action Required** | | |
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| Suggestions & Advice | Action Owner | Due Date |
| 4.1 Understanding the organization and its context | **New** | New requirement. There are many internal and external issues that affect, or have the potential to affect, the OH&S management system. It is imperative these are identified so that there is clear understanding and appreciation of the operating environment.  Ensure that OH&S-related internal and external factors and conditions have been identified that could affect, or be affected by, your organisation’s activities. Ensure that any significant risks and opportunities been identified. What drives the OH&S culture of your organization?  Using the ***SWOT*** and ***PESTLE*** analysis templates, undertake an analysis of internal and external issues. This provides clear evidence that a comprehensive process has been carried out to understand the context within which your organization operates. This activity will also help to determine the scope of OH&S management system as required under Clause 4.3 and 9.3b.  Examples of external issues suitable for PESTLE analysis include:   1. Pressure groups and worker unions; 2. Insurers and stakeholder views; 3. Economic conditions; 4. Social expectations and political priorities; 5. Legislation and enforcement; 6. National/international agencies.   Examples of internal issues suitable for SWOT analysis include:   1. Structure, accountabilities, competence, commitment and control; 2. New products, contractual issues, cooperation and communication. |  |  |
| 4.2 Understanding the needs and expectations of workers and other interested parties | **New** | New requirement. Interested parties are stakeholders – any individual or organization that can affect the OH&S management system, or any individual or organization that the management system can affect. In both cases, the effect can be negative as well as positive.  Who might affect or be affected by your activities and what their relevant and significant interests might be? Have you taken their needs into account within the OH&S management system?   1. Needs and expectations of both managerial, and non-managerial workers, and workers representatives (where they exist); 2. Affect OH&S management system or which perceive themselves to be affected by OH&S system (A.4.2); 3. Worker and appropriate workers’ representatives; 4. Legal and regulatory authorities; 5. Parent organizations; 6. Suppliers, co-contractors and subcontractors; 7. Workers’ organizations (trade unions) and employers’ organizations 8. Owners, shareholders, clients, visitors, local community, neighbours, general public; 9. Occupational health and safety organizations; occupational safety and health-care professionals (e.g., doctors, nurses).   The first task in meeting the requirements of this clause is to identify all the stakeholders and interested parties and undertake a comprehensive stakeholder analysis. The ***Stakeholder Analysis*** template will also provide useful information that will further underpin the requirements of Clause 4.3, 6.1 and 9.1.2. |  |  |
| 4.3 Determining the scope of the OH&S management system | 1 & 4.1 | No significant change. Ensure that your scope statement is relevant to:   1. The external and internal issues referred to in 4.1; 2. Requirements referred to in 4.2; 3. The types of work-related activities performed.   Any changes to the scope should be subject to the requirements of the standard and subject to audit by the conformity assessment/Certification Body who would confirm, or otherwise, the inclusion of the change under the certification. |  |  |
| 4.4 OH&S management system | 4.1 | No significant change. There is now a greater focus on the OH&S processes and the associated documentation. The ***Process Matrix*** template provides a useful tool for identifying and addressing the requirements of this clause. It provides useful evidence for demonstrating the processes that underpin OH&S activities.  It is also a useful planning tool in terms of providing input into the requirements of other clauses including those associated with risk, planning, resources, and the monitoring and measuring of outputs of the management system. The process matrix can be a useful artefact to present at audit. |  |  |

## 5.0 Leadership and Worker Participation

| **ISO 45001:2018 Clause** | **18001:2007 Clause** | **Evidence/Action Required** | | |
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| Suggestions & Advice | Action Owner | Due Date |
| 5.1 Leadership and commitment | 4.4.1, 4.4.3, 4.4.6 | Minor change. Is top management engaged and leading OH&S, rather than delegating to someone further down your organisation. Are workers being involved directly to protect, improve performance, and support the OH&S system.   1. Ensuring that the OHS policy and OHS objectives are established and are compatible with the strategic direction of the organisation; 2. Integrating the OHS management system requirements into the organisation’s business processes; 3. Providing the necessary resources for the OHS management system; 4. Communicating the importance of effective OHS management; 5. Directing and supporting persons to contribute to the effectiveness of the OHS management system; 6. Assisting other relevant management roles to demonstrate their leadership as it applies to their areas of responsibility. |  |  |
| 5.2 OH&S policy | 4.2 | Minor change. Enhanced requirements from the 2007 version: more attention to be paid to the communication and participation of workers, across the organization.  Organizations must commit to “satisfy” legal and other requirements and must apply the hierarchy of controls to OH&S risks. The policy must be available as documented information.  ***Update*** your safety policy statement to emphasise communication and the participation of workers, across the organization; commit to satisfy legal and other requirements; commit to the hierarchy of controls to OH&S risks. |  |  |
| 5.3 Organizational roles, responsibilities and authorities | 4.4.1 | No significant change. Top management can delegate tasks but not responsibility. ISO 45001 requires personal involvement from top management in the OH&S management system.  A traditional organization chart is still an excellent tool for illustrating reporting lines, but it is imperative that it is kept up to date, available as documented information, as both hard and soft copies.  Auditors frequently use the organization chart as a starting point for an audit because it should clearly illustrate the scope of the OH&S management system. |  |  |
| 5.4 Consultation and participation of workers | 4.4.2, 4.4.3, 4.5.1, 4.5.2, 4.5.3 | Enhanced clause. This clause has been substantially strengthened to capture and promote worker participation, engagement and communications.  Promote the participation of non-managerial roles within the OH&S system requirements, including incident investigations, risk assessments, plus control and monitoring activities including internal auditing.  Demonstrate the participation of non-managerial employees in OH&S management, including incident investigations, risk assessments, control and monitoring activities and internal auditing. |  |  |

## 6.0 Planning

| **ISO 45001:2018 Clause** | **18001:2007 Clause** | **Evidence/Action Required** | | |
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| Suggestions & Advice | Action Owner | Due Date |
| 6.1.1 Actions to address risks and opportunities - General | 4.3.1, 4.3.2 & 4.3.3 | No significant change. Ensure that the risks and opportunities from 4.1 are documented and that actions have been defined to take advantage of opportunities and mitigate the risks associated with the OH&S management system? Demonstrate that these actions have been effective. This information must be available as documented information. |  |  |
| 6.1.2.1 Hazard identification | 4.3.1 | New requirement. This element of ISO 45001 is identical to the hazard identification and risk evaluation in OHSAS 18001. Ensure your organization’s hazard identification process considers:   1. Routine and non-routine activities and situations; 2. Human factors; 3. New or changed hazards; 4. Potential emergency situations; 5. People; 6. Changes in knowledge of, and information about, hazards.   In 6.1.1, there is a new requirement to identify opportunities, as well as:   1. Consideration of workers at a location not under the direct control of the organization; 2. Consideration of those in the vicinity of the workplace who can be affected by the activities of the organization; 3. Other issues including situations not controlled by the organization and occurring in the vicinity of the workplace that can cause ‘work-related’ injury or ill health. |  |  |
| 6.1.2.2 Assessment of OH&S risks and other risks to the OH&S management system | **New** | New requirement. Processes for the assessment of risk to the OH&S management system must be available as documented information and must consider day-to-day operations and decisions (e.g. peaks in work flow, restructuring) as well as external issues (e.g. economic change).  Methodologies can include ongoing consultation of workers affected by day-to-day activities (e.g. changes in work load), monitoring and communication of new legal requirements and other requirements (e.g. regulatory reform, revisions to collective agreements regarding occupational health and safety), and ensuring resources meet existing and changing needs (e.g. training on, or procurement of, new improved equipment or supplies). |  |  |
| 6.1.2.3 Assessment of OH&S opportunities and other opportunities for the OH&S management system | **New** | New requirement. The process for assessment should consider the OH&S opportunities and any other opportunities determined, their benefits and potential to improve OH&S performance. |  |  |
| 6.1.3 Determination of legal requirements and other requirements | 4.3.2 | No significant change. Legal requirements can result in risks and opportunities to the organization and may arise from mandatory requirements, applicable laws and regulations, voluntary commitments such as organizational and industry standards, contractual relationships, principles of good governance and community and ethical standards. Maintain documented information on legal, and other requirements.  The needs and expectations from interested parties only become obligatory requirements for an organization if it chooses to adopt them. |  |  |
| 6.1.4 Planning action | 4.3.3 | New requirement. This is a new element of the standard. The essence is that it be clear how the management system addresses the risks, opportunities, compliance obligations and emergency preparedness and response measures arising from 6.1.2, 6.1.3 and 8.2.  This can take the form of control measures in the implementation section (8), or formulating objectives (including for improvement), as seen in 6.2. The ‘familiar programme’ from the OHSAS 18001 is now linked to the objectives (6.2.2). |  |  |
| 6.2.1 OH&S objectives | 4.3.3 | No significant change. Are objectives compatible with the policy statement, OH&S risks and opportunities, business context and adequately resourced? Objectives and plans to achieve them must be documented.  There should be a record of who is responsible, agreed timings, measures in place to establish progress and whether they have been achieved. |  |  |
| 6.2.2 Planning to achieve OH&S objectives | 4.3.3 | No significant change. Objectives must support the policy requirements and have been considered in line with available resources. There should be detail of who is responsible, agreed timings and measures in place to establish progress and whether proposed achievements have been met.  Objectives and plans to achieve them should be maintained and retained as documented information. |  |  |

## 7.0 Support

| **ISO 45001:2018 Clause** | **18001:2007 Clause** | **Evidence/Action Required** | | |
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| Suggestions & Advice | Action Owner | Due Date |
| 7.1 Resources | 4.4 | No significant change. |  |  |
| 7.2 Competence | 4.4.2 | Minor change. Documented evidence of competence. Documented evidence that the effectiveness of training has been checked. |  |  |
| 7.3 Awareness | 4.4.2 | Enhanced clause. Are workers aware of policy requirements, hazards & risks relevant to them and their part in the OH&S performance, including results of relevant incident investigations? |  |  |
| 7.4.1 Communication - General | 4.4.3 | Minor change. Participation and consultation are diffused through 45001, but this clause adds a requirement to consider what and why needs to be communicated and whether the communication was successful.  In ISO 45001 there must be a process to document what, when, with whom and how communication took place. Communication with contractors is also required based on 8.1.6.  Another new element is that the organization must ensure that the  communicated information is reliable and is consistent with the information arising from the OH&S management system and is retained as documented information. |  |  |
| 7.4.2 Internal communication | 4.4.3 | Minor change. Internally, organizations have to communicate information relevant to the OH&S management system amongst all levels and functions, including information on any change, as appropriate, and have to establish a mechanism to enable all persons performing work under the organization’s control to contribute to continual improvement. |  |  |
| 7.4.3 External communication | 4.4.3 | Minor change. Externally, organizations have to communicate as required by their compliance obligations. Additionally, organizations may choose to communicate on other issues, as appropriate. |  |  |
| 7.5.1 Documented Information - General | 4.4.4 & 4.4.5, 4.5.4 | Minor change. Documented information replaces the idea of documents and records, but no significant change is needed. |  |  |
| 7.5.2 Creating and updating | 4.4.4 & 4.4.5 |  |  |
| 7.5.3 Control of documented information | 4.5.4 |  |  |

## 8.0 Operation

| **ISO 45001:2018 Clause** | **18001:2007 Clause** | **Evidence/Action Required** | | |
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| Suggestions & Advice | Action Owner | Due Date |
| 8.1.1 Operational planning and control - General | 4.4.6 | Enhanced clause. Have controls for hazards and risk controls been planned and included in operational controls and do these allow for capabilities of the workforce? Are these documented where necessary? |  |  |
| 8.1.2 Eliminating hazards and reducing OH&S risks | **New** | New requirement. Is the hierarchy of OH&S controls correctly applied? Organization shall establish a process & determine controls for achieving reduction in OH&S risks using following hierarchy:   1. **Hazard Elimination**: avoiding risks, adapting work to workers, (integrate health safety and ergonomics when planning new work places; create physical separation of traffic between pedestrians and vehicles 2. **Substitution**: replacing the dangerous by non-dangerous or less dangerous (replacing solvent-based paint with water-based paint) 3. **Engineering Controls**: Implement collective protective measures (isolation; machine guarding; ventilation; noise reduction etc.) 4. **Administrative Controls**: Giving appropriate instructions to workers (lock out processes; induction; forklift driving licenses, etc.) 5. **Personal Protective Equipment (PPE)**: Provide PPE and instructions for PPE utilization/maintenance, i.e. safety shoes, safety glasses, hearing protection, chemical & liquid resistant gloves; electrical protection gloves, etc.) |  |  |
| 8.1.3 Management of change | **New** | New requirement. When changes to the operation are planned, is the effect on the OH&S management system considered? Documented information needs to be retained relating to planned changes and their potential impact on the OH&S management system. |  |  |
| 8.1.4.1 Procurement - General | **New** | New requirement. OH&S controls are now relevant to the purchase of goods and materials. Establish controls, within your existing procurement process, to ensure that the procurement of goods (for example products, hazardous materials or substances, raw materials, equipment) and services conform to your OH&S management system requirements.  Prior to procuring goods & services, the organization should identify procurement controls that:   1. Identify and evaluate potential OH&S risks associated with products, materials, equipment, service; 2. Requirements for products, materials, equipment, services to conform to OH&S objectives; 3. Need for information, participation and communications 4. Before using verify equipment, installations and materials are adequate before being released for use by workers; 5. Items are delivered to specification and tested to ensure they function as intended; 6. Usage requirements, precautions or other protective measures are communicated and made available. |  |  |
| 8.1.4.2 Contractors | **New** | New requirement. Controls and communication requirements with regard to contractor’s worker activities, the host company’s worker activities, and anyone who may be affected by the activity in the workplace.  The establishment of controls and communication requirements with regard to contractor’s worker activities, the host company’s worker activities, and anyone who may be affected by the activity in the workplace. |  |  |
| 8.1.4.3 Outsourcing | **New** | New requirement. The OH&S implications must be controlled as part of the purchasing process. Your organization must ensure that outsourced processes affecting OH&S management system are controlled.  An outsourced process is one that:   1. Is within scope of your OH&S management system; 2. Is integral to your organization’s functioning; 3. Is needed for your OH&S management system to achieve its intended outcome; 4. Liability for conforming to requirements is retained by the organization; 5. Organization and external provider have a relationship where the process is perceived by interested parties as being carried out by your organization. |  |  |
| 8.2 Emergency preparedness and response | 4.4.7 | Enhanced clause. The revised standard strengthens and expands on the previous requirements and also includes communications. Ensure that emergency plans take the needs of relevant third parties into account and are tested periodically and are maintained and retained as documented information. Emergency drills should be evaluated, learned from and improved. |  |  |

## 9.0 Performance Evaluation

| **ISO 45001:2018 Clause** | **18001:2007 Clause** | **Evidence/Action Required** | | |
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| Suggestions & Advice | Action Owner | Due Date |
| 9.1.1 Monitoring, measurement, analysis and evaluation - General | 4.5, 4.5.1 | Enhanced clause. Demonstrate that there is a *process* in place. Monitoring, measurement, analysis and evaluation of OH&S metrics must take into account business context, relevant third parties, policy risks, opportunities and objectives. Ensure that performance monitoring and measurement results are retained as documented information. |  |  |
| 9.1.2 Evaluation of compliance | 4.5.2 | Enhanced clause. Similar to existing arrangements, but the frequency and method of compliance checking need to be considered. As before, maintain documented information on the results of compliance evaluation results. |  |  |
| 9.2.1 Internal audit - general | 4.5.5 | No significant change. Existing audit arrangements should suffice. |  |  |
| 9.2.2 Internal audit programme | 4.5.5 | Enhanced clause. Workers must be included in the audit process and the development of the audit plan. Retain the audit programme and the audit results as documented information. |  |  |
| 9.3 Management review | 4.6 | No significant change. Added emphasis on improvement and communications based on risks, opportunities and system effectiveness. Retain your management your review minutes as documented information. Note the new input requirements in the standard. |  |  |

## 10.0 Improvement

| **ISO 45001:2018 Clause** | **18001:2007 Clause** | **Evidence/Action Required** | | |
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| Suggestions & Advice | Action Owner | Due Date |
| 10.1 Improvement - General | 4.5.3, 4.5.3.1, 4.5.3.2 | Minor change. Ensure employees are involved in continual improvement and receive communication regarding improvement initiatives. |  |  |
| 10.2 Incident, non-conformity and corrective action | 4.5.3, 4.5.3.1, 4.5.3.2 | Enhanced clause. This clause states the requirements for the occurrence of an incident or non-conformity. The requirements also include action to prevent a similar incidents or non-conformities occurring. This must be achieved via review and analysis to determine what caused it, and any actions to prevent it re-occurring in the future.  This clause requires that appropriate action be taken to address the effects of the problem. This may require a simple correction by an Operative or, in a major event, significant levels of resources.  A risk analysis can help to determine the appropriate actions that need to be taken. Any ongoing risks should be recorded in your risk register and taken into account during future planning activities.  Any non-conformities and subsequent actions to prevent the reoccurrence and the effectiveness of the corrective action(s), should be duly documented and retained. |  |  |
| 10.3 Continual improvement | 4.5.3, 4.5.3.1, 4.5.3.2 | Minor change. Demonstrate that continual improvement is planned, implemented and maintained. The required and actual outcomes of continual improvement should be communicated to employees. This clause aims to ensure progress is being made to improve the effectiveness of the OH&S management system.  Overall, it is important that the processes have identified any issues and that they have been documented and are in the process of being rectified. |  |  |