

AUDIT IN OCCUPATIONAL MEDICINE

Auditing health and safety management systems: a regulator's view

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HSE's publication 'Successful Health and Safety Management' (HSG65) describes key elements of successful health and safety management systems. A three level model is explained and one of the elements, auditing, is explored in detail by the regulator. The term auditing in the health and safety context is defined and the use of proprietary and in-house systems compared. The process of auditing is described and the regulator concludes by encouraging organizations to use auditing schemes, without endorsing any particular one, as they can be a powerful tool for checking the adequacy of health and safety management systems.

Key words: Auditing; health and safety management; HSE; regulator.

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INTRODUCTION

In 1991 the Health and Safety Executive (HSE) published *Successful Health and Safety Management* — HS(G)65,¹ which has recently been revised. This publication describes the key elements of successful health and safety management systems (HSMS), namely: policy, organizing, planning and implementing, measuring, auditing and reviewing performance, (POPMAR) and the relationship between them. This paper concentrates on the auditing function and HSE's view. As a regulator, HSE seeks to encourage organizations to assess their health and safety management systems using audits. Auditing is not a legal requirement except where required by the safety cases prepared by offshore oil installations and train operating companies; so enforcement is not generally an issue. HSE supports the use of proprietary schemes but does not endorse any particular one.

There is no single accepted definition of the term 'audit' and in practice 'auditing' is used by organizations to describe a range of measuring activities including physical conditions checks as well as management systems. In fact some proprietary auditing systems are also used by line managers as internal monitoring systems. For the purposes of this paper the definition excludes physical checklists and walk around inspections, unless these activities are undertaken as part of a more comprehensive system covering the management issues of policy, organizing, planning and implementing, measuring and reviewing. Regulation 4 of the Management of

Health and Safety at Work Regulations 1992 requires the provision of effective health and safety arrangements covering planning, organization, control, monitoring and review.

Auditing is an essential element of a health and safety management system, but is not a substitute for the other parts of the system. Nevertheless some people make this mistake. Organizations cannot manage finances by an annual financial audit; they need systems to pay bills and manage cash flow throughout the year. Similarly, organizations need systems to manage health and safety on a day-to-day basis. This cannot be achieved by a periodic audit.

THE HEALTH AND SAFETY MANAGEMENT MODEL

HS(G)65 describes three components of a health and safety management system:

Workplace precautions

These are the precautions that have to be provided and maintained to prevent harm to people at the point of risk. Risks are created in the business process as resources and information are used to create products and services. Workplace precautions to match the hazards and risks are needed at each stage of the business activity. They can include machine guards, local exhaust ventilation, safety instructions and systems of work.

Risk control systems

Risk control systems mirror the high level management arrangements described below in that each one should

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have a POPMAR structure. They are the basis for ensuring that adequate workplace precautions are provided and maintained, and each one covers a specific hazard. Some are inputs to an organization (safe labelling of chemicals for supply, selection of suitable contractors); some are for processes within the organization (control of hazardous substances in use, managing contractors on site); others are for outputs (supplying safe chemicals to someone else, ensuring a newly built structure will not fall down). Potentially there are large numbers of these, but organizations need risk control systems which are appropriate to the main hazards arising from their activities and sufficient to cover all significant risks. The design, reliability and complexity of each risk control system needs to be proportionate to the particular hazards and risks.

All should be auditable, but in practice it is preferable for any one audit to sample the most important ones. Valuable information can be learned about how well the top level arrangements are working in practice.

Management arrangements

A set of high level management processes is necessary to organize, plan, control, monitor and review the implementation of the risk control systems. These are the key elements of health and safety management.

The three components can be assembled into a single picture of a health and safety management system and it is this which forms the structure for a management systems audit.

AUDITING

To be effective auditing should be used over time to verify the adequacy of each of these components. For multi-site organizations, auditing should include the management arrangements linking the centre with the business units and sites. In practice many audit systems fail to include this.

The aims of auditing should be to establish that:

- appropriate management arrangements are in place;
- adequate risk control systems exist which both reflect the hazard profile of the organization and are properly implemented and
- appropriate workplace precautions are in place.

Various techniques can achieve this and some components of the system do not need to be audited as often as others. A full health and safety audit is demanding of resources and HSE does not seek to burden companies unnecessarily. Rather we look for an effective use of resources reflected in a sensible programme based on the hazard/risk profile of the organization. As an example, an audit of the management arrangements and the overall capability of an organization to manage health and safety may not need to be done as often as an audit to verify the implementation of critical risk control systems which control the main hazards of the business. Technical audits may be necessary to verify the continued effectiveness of

complex workplace precautions, such as process plant integrity and control systems.

A comprehensive picture of how effectively the health and safety management system is controlling risks will emerge from a well-structured auditing programme, indicating when and how each component will be audited. A team approach, involving managers, safety representatives and employees is an effective way to widen involvement and co-operation in devising and implementing the programme.

IN-HOUSE VS. PROPRIETARY AUDITS

The main reasons organizations use audit systems is to establish a benchmark for the health and safety management system and to provide a mechanism to improve it.

There are two types of audits found within organizations: in-house systems and proprietary systems. Proprietary audit systems can be defined as audit systems that can be purchased off-the-shelf by an organization to audit itself. They may be applied as purchased or be tailored to the organization for its own use. These systems may also be applied by the suppliers and auditors if requested by the organization. In-house systems are those that are devised and developed by the organization itself. The way the systems are operated is crucial to the success or failure of the audit, and all require a high level of management commitment. It is important that the system chosen, either in-house or proprietary, effectively measures levels of performance against standards and highlights aspects for improvement and/or inclusion in the health and safety management system.

THE AUDIT PROCESS

The auditing process involves collecting information about the health and safety management system and making judgements about its adequacy and performance.

Collecting information

All audits involve sampling, and it is important to ensure that the sample selected for audit will allow a reliable assessment of the health and safety management system. Auditors have three information sources on which to draw, namely: interviewing individuals, examining documents and observing work activities.

Interpreting information

It is important that once the information has been gathered using the above sources the adequacy of the health and safety management system is determined by comparing what is found against the relevant standards or benchmarks previously described. If there are no clear standards then the value of the audit system will be limited. You must know what you are measuring against for results to have meaning and be a basis for action.

Auditing should not be a fault-finding activity but an objective snapshot that recognizes positive achievements

while also noting areas for improvement. In some audits scoring systems are used to weight findings. This can help with comparing audit scores over time or between sites, but there is no evidence to suggest that quantifying the results gives better results than an approach providing qualitative evidence alone. Scoring systems may also mask a deterioration in performance if the underlying detail is not examined. There is also the temptation to pursue high marks by selecting areas where an easy win is possible and ignoring some other high hazard processes. Some proprietary systems may allow this to be done.

Experience, however, suggests that any organization undertaking auditing will gain some benefits, providing they answer the questions truthfully and understand the system's limitations. The very process of undertaking an audit can itself improve a health and safety management system, if only because of increased awareness and involvement of senior management.

Audit controls

Like any process, there need to be controls to ensure that an audit is applied rigorously and consistently. Organizations should ensure that audits are taken seriously by all

levels of management as a valuable tool and not driven by the safety professionals. They must be applied as designed, especially when scoring systems are used for comparisons. Auditors must be competent and have received sufficient training. Finally, there should be controls for effectively implementing the results and recommendations arising from the audit.

CONCLUSION

HSE encourages organizations to assess their health and safety management systems using in-house or proprietary schemes but without endorsing any particular one. Used properly audits are a powerful tool in checking the continued health and vigour and application of the health and safety management system.

REFERENCES

1. Health and Safety Executive. *Successful Health and Safety Management* — HS(G)65. UK: HSE: 1997.