AUDIT MANAGEMENT SYSTEM OF OCCUPATIONAL HEALTH AND SAFETY IN MINING

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Abstract

OHSMS is in place it is important to regularly audit the system to determine whether it is operating as expected, compliances are being complied with. Auditing is the process of assurance that all the provisions of laws, rules, regulations and policies are being followed effectively. OHS Audits are risk-based, designed to manage high risk areas/processes. Higher risk areas/processes are audited more frequently than lower risk areas/processes. OHS management audits identify strengths and weaknesses within a workplace’s OHS program in areas such as accountability, policy, hazard identification and control, training, communication and more. The process is done by assessing how well the OHS program meets legislation, regulations, guidelines and established best practices.

Keywords:- Audit of Occupational Health and Safety Management System, Types of Audit, Risk Classification and Frequency, Audit Scope, Process and Reporting, Audit Programme AS PER (Final Draft International Standard) FDIS ISO 45001.

1. Audit of Occupational Health and Safety Management System (OHSMS)

Once the OHSMS is in place it is important to regularly audit the system to determine whether it is operating as expected, compliances are being complied with. Auditing is the process of assurance that all the provisions of laws, rules, regulations and policies are being followed effectively.

An OHS audit is a systematic, independent and documented process for obtaining evidence of the implementation of an OHS management system. OHS Audits are risk-based, designed to manage high risk areas/processes. Higher risk areas/processes are audited more frequently than lower risk areas/processes.
Sources:
https://www.allacronyms.com/OHSMS/Occupational_Health_and_Safety_Management_System

1.1. Types of Audits

Audit process is generally based on the requirement and the purpose of the organization. Basically there are three types of audits:

(1.) Self Audit
(2.) Internal Audit
(3.) External Audit

(1.) Self Audit

A self audit is an audit conducted by the internal team of the management to track effectiveness of the OHSMS in the organization, compliances with the OHS policy, OHS laws and regulations. A self audit is the assessment of the effectiveness of the internal control over the OHSMS. It is more like self check rather than an audit.

(2.) Internal OHS Audit

It is also a type of audit which is arranged by the internal management of the organization but an internal auditor is appointed who is independent of the audit. It is the audit of the entire OHS system including the documentation. This type of audit is carried throughout the period. The internal auditor conducts the audit as per the scope of the work as determined, in consultation with management and those charged with governance.

The internal auditor ensures himself, that OHS Management System audits are conducted to a consistent standard in the organization, allowing verification that the OHSMS:
High risk
Where multiple regulated hazards are present in a significant proportion of the workplace operations, e.g. construction work, electrical work, working at heights, hazardous substance, dangerous goods, hazardous building materials, registrable or regulated plant, confined spaces, hazardous manual handling and/or occupational noise.

Moderate risk
Where only a single regulated hazard is present in a significant proportion of the workplace operations, or where multiple regulated hazards are present, but in less than a significant proportion of the workplace operations, e.g. construction work, electrical work, working at heights, hazardous substance, dangerous goods, hazardous building materials, registrable or regulated plant, confined spaces, hazardous manual handling and/or occupational noise.

Low risk
Where regulated hazards are generally not present in the workplace operations. This includes office-based administrative operations, and non-laboratory or workshop-based teaching/learning/research operations.

Audit Frequency: Audit frequency in internal audit must be based upon the risk assessment of the organisation. More risk means more audit frequency, and an acceptable level of risk tolerance must be decided between the internal auditor and those charged with governance and accordingly, audit frequency must be decided.

1.2. Risk classification and frequency

The risk classifications include:

The following table describes the normal frequency of internal audits according to the nominal risk classification:
Frequency of the audit can be increased by as per the immediate requirement of the circumstances and on the demand of the management or those charged with governance of the organization.

1.3. Audit Scope

As the audit frequency has been determined auditor and auditee must define the scope of the OHS audit work. The management in consultation with those charged with governance, shall provide broad instruction to the internal auditor for each internal audit, by nominating audit workbook subjects to be assessed. Audit workbook subjects include:

- OHSMS Audit Policy
- Legal Requirements and Practical Guidance
- Management Plans
- Objectives and Targets
- Structure and Responsibility
  - Resources
  - Responsibility and Accountability
  - Training and Competency
- Consultation, Communication and Reporting
  - Consultation
  - Communication
  - Reporting
- Documentation (Policy, Plans Procedures, SOPs, Instructions)
- Document and Data Control
- Risk Management Program and Operational Control
- Risk Management and Control
  - Access Control
  - Workplace Facilities and Amenities
  - Safety Signage
- Hazard Identification, Risk Assessment and Control of Risks
  - Purchasing and Management of Contractors
  - Product, Structures and Process Design
  - Chemicals, Substances and Waste

<table>
<thead>
<tr>
<th>RISK QUALIFICATION</th>
<th>FREQUENCY OF AUDIT</th>
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<tbody>
<tr>
<td>HIGH</td>
<td>HALF YEARLY</td>
</tr>
<tr>
<td>MODERATE</td>
<td>YEARLY</td>
</tr>
<tr>
<td>LOW</td>
<td>ONCE IN TWO YEARS</td>
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</tbody>
</table>
✓ Risk Management
  o High Risk Tasks
  o Personal Protective Equipment
  o Plant and Equipment
  o Materials Transport, Storage and Handling
  o Supervision
  o Supply of Services and Goods to Others

✓ Emergency Preparedness and Response

✓ Monitoring and Measurement
  o General
  o Health Surveillance

✓ OHSMS Nonconformity, Incident Investigation, Corrective and Preventive Action

✓ Management System Audits

✓ Records and Records Management

✓ Management Review.

The internal auditor must develop the detailed audit plan according to audit workbook subject as mentioned above and submit the same to the management and to those charged with governance.

1.4. Audit Process

Generally audit process is defined with the professional expertise of the auditor individually, that how he performs the process in particular situation, but the internal auditor must perform the following process in the organization and should amend the process time to time, the internal auditor should:

  (1) Conduct an opening meeting with the relevant auditee representatives

  (2) Seek input from a representative sample of stakeholders to review consultative arrangements and the effective implementation of the OHSMS, including:

  | OHS committee members                           |
  | Management representative(s)                    |
  | Employee health and safety representative(s)     |
  | Other personnel in the area subject to the audit |
(3) Review and assess relevant local workplace documentation, including:

- OHS Management Plans, Objectives and Targets
- OHS Risk Register, Risk Assessments and SOPs
- OHS Training Needs Analysis, Training Plan and Training Records
- OHS Cyclic Events Checklists and Workplace Inspections
- Pre purchase risk assessments and purchasing documentation
- Service provider (contractor) documentation
- Emergency and First Aid assessments
- Chemical inventories, risk assessments and MSDS
- Plant risk assessments, maintenance and inspection records
- OHS Committee meeting minutes

(4) Review and assess the implementation of local workplace risk controls, including:

- Plant
- Electrical
- Chemical storage and handling
- Manual Handling
- Housekeeping
- Workplace facilities and amenities
- Emergency and First Aid equipment and facilities
- Other relevant risks

(5) Conduct any other relevant information gathering required to complete the audit.
1.5. Reporting

(i.) Internal Audit

Internal OHS Audit Report after conducting his audit should give his report and recommendations, which must be based on the audit evidences, a fair detailed, must be submitted to the management. The Internal Audit report shall include a Corrective Action Report for each:

- Non Conformance finding
- Requires Correction finding.

The management of the organization after receiving the internal audit report ensures that documented Corrective Action Plans, including prioritization of planned corrective actions, are developed and provided to the Internal Auditor, for each:

- Non Conformance finding
- Requires Correction finding.

It is the duty of the management and those charged with governance to table the Audit Reports to the Health and Safety or Environmental Committee meetings, for monitoring of implementation of corrective actions. The internal auditor must be present in all the meetings of Health and Safety or Environmental Committee.

The Internal Auditor shall report Internal OHS audit results to:

(3.) External Audit

An external OHS audit is an OHS audit conducted by an external auditor. The reporting purpose of this audit is not management or those charged with governance, but to public at large or under the requirement of any law or regulation. The external auditor may be appointed by the management or by the external agency who wants to assess the effectiveness of the OHS management system.
Report in this audit is more independent than internal audit because there is no influence of the management or any internal officer over the independent external auditor. The audit is normally conducted once in a year according to the rules and regulation under which audit is conducted.

This type of audit may also be conducted for some specific purpose that may be as per the specific requirement of law or the specific requirement of any organization who wants to assess the actual position of the OHS management system in the organization.

Certification and surveillance OHS audits are also part of external audit. A certification body conducts the audit to assess whether the OHS management system meets the requirements of Occupational Health & Safety Management Systems – specifications with guidance for use and OHSAS 18001:2007 Occupational Health and Safety Systems – Requirements.

2. Audit Programme AS PER (Final Draft International Standard) FDIS ISO 45001

As per DIS ISO 45001, ISO 45001:2016 is going to be in effect in December 2017, according to (First Draft International Standard) DIS ISO 45001 audit means, systematic, independent and documented process for obtaining audit evidence and evaluating it objectively to determine the extent to which the audit criteria are fulfilled.
Sources:-
https://www.google.co.in/search?q=Images+on+Audit+Programme+AS+PER+(Final+Draft+International+Standard)

ISO 45001 itself has an internal audit programme as follows:

“9.2 Internal audit:

9.2.1 Internal audit objectives

The organization shall conduct internal audits at planned intervals to provide information on whether the OH&S management system:

(a) conforms to:

(i) the organization’s own requirements for its OH&S management system, including the OH&S policy and OH&S objectives;

(ii) the requirements of this International Standard;

(b) is effectively implemented and maintained.

9.2.2 Internal audit process

The organization shall:

(a) plan, establish, implement and maintain an audit programme(s) including the frequency, methods, responsibilities, consultation, planning requirements and reporting, which shall take into consideration the importance of the processes concerned and the results of previous audits, as well as:

(1) significant changes impacting the organization;

(2) performance evaluation and improvement results (see Clauses 9 and 10);

(3) significant OH&S risks, risks and OH&S opportunities;

(b) define the audit criteria and scope for each audit;

(c) select competent auditors and conduct audits to ensure objectivity and the impartiality of the audit process;

(d) ensure that the results of the audits are reported to relevant management;

(e) ensure that relevant audit findings are reported to relevant workers, and where they exist, workers’ representatives, and relevant interested parties;

(f) take appropriate action to address nonconformities (see 10.1) and continually improve its OH&S performance (see 10.2);

(g) retain documented information as evidence of the implementation of the audit programme and the audit results.”
To implement above provisions Annexure to FDIS ISO 45001 itself provides following guidelines:

“A.9.2.1 Internal audit objectives

An organization’s own requirements for its OH&S management system audits may be additional to those required by this International standard.

Internal audit objectives can be based on:

a) an organization’s own policies, requirements and top management’s OH&S priorities;
b) standards;
c) results of both OH&S risk and risk assessments;
d) results of previous audits, including contractor audits;
e) incidents, corrective actions and nonconformities;
f) worker participation;
g) needs and expectations of interested parties;
h) level of maturity of the management system;
i) performance evaluation results.

A.9.2.2 Internal audit process

When planning its internal audits the organization should take into consideration the importance of the processes concerned to the OH&S management system. This can include items such as the impact the processes have on risk assessment outcomes.

The extent of the audit programme should be based on the size and nature of the organization, as well as the complexity and level of maturity of the OH&S management system.

Small and medium enterprises (SMEs) can establish objectivity and impartiality of the internal auditor by creating processes that separate their role as an internal auditor from their normal assigned duties. SMEs can also use external organizations in this role.”

3. Conclusion

OHS management audits identify strengths and weaknesses within a workplace’s OHS program in areas such as accountability, policy, hazard identification and control, training, communication and more. The process is done by assessing how well the OHS program meets legislation, regulations, guidelines and established best practices. As such, audits play an important role. For example, they can:

(1.) Identify areas that need improvement in order to protect workers from injury and illness;
(2.) Ensure legislative compliance;
(3.) Benchmark OHS practices; and
(4.) Determine organizational penalties administered by regulatory and certification bodies. Consistency is required in the audit process and need to be reported regularly to the concerned department and to the upper management. For an effective audit program the process must start from the very inception of the OHSMS policy i.e. the auditor must be involved in policy making process so that audit risk can be reduced to an acceptable level and surety of compliance of all the legal provision and regulation can also be obtained.

References


