HEALTH AND SAFETY AUDITING AND PLANNING

LEARNING OUTCOME

- Describe the process of auditing and planning as they relate to health and safety systems management.
- Plan the audit in accordance with statutory requirements and best practice.
- Gather resources in accordance with best practice.
- Notify relevant parties about the audit.
- Conduct the audit in accordance with statutory requirements and best practice.
- Check compliance against statutory requirements and best practice.
- Prepare a health and safety audit report from the findings of the audit in accordance with best practice.
- Submit the health and safety audit report to relevant parties.
- Develop an action plan addressing areas of non-compliance identified in the audit.

REFERENCES

- Work Health and Safety Regulation 2011 Chapter 6 (Construction Work);
- Safety Map – Health and Safety Management Systems (Victorian WorkCover);
- AS1470 – Health and Safety at Work – Principles and Practices;
- CCH International Workplace Health and Safety Manual;
- CCH International 1991, Planning for Occupational Health and Safety, 3rd Edition;
- Work Health and Safety Regulation 2011 – s765 – WHS Management Plan;
- Work Health and Safety Act 2011 S27 – Due Diligence.

HEALTH AND SAFETY AUDITING AND PLANNING

The Work Health and Safety Legislation imposes a duty on persons conducting a business or undertaking (PCBU) to ensure a safe place of work exists for their workers and other persons. To meet this duty:

- If the Work Health and Safety Regulation 2011 (WHS Regulation) prescribes a way of preventing or minimising exposure to a risk, a person may discharge their duty only by following the prescribed way.
- If a Code of Practice states a way of managing exposure to risk, a person discharges their duty only by:
    a. adopting and following a stated way that manages exposure to the risk; or
    b. adopting and following another way that gives the same or higher level of protection against the risk.

In the situation where there is no Regulation or Code of Practice stating a way to manage the risk, then a person may choose any appropriate way to discharge their duty. However, the PCBU discharges their health and safety duty only if they take reasonable precautions and exercise proper diligence. This defence can only be achieved through the implementation of proper risk management systems.

Risk management requires:

- The identification of situations posing possible injury and health risks to personnel;
- Assessment of the potential effects associated with these risks;
- Selection of procedures that will minimise these effects;
- Implementation of the procedures within the organisation; and
- The monitoring and reviewing of the procedure.

This type of management is proactive in comparison to a reactive approach after an incident occurs within an organisation. In most organisations, health and safety management systems are limited to incident reporting, first aid, rehabilitation, and emergency equipment and procedures. These systems are necessary, however, are reactive measures and do not address the minimisation of potential incidents.

MANAGEMENT SYSTEMS

Most organisations have implemented a range of management systems, i.e. financial, quality, environmental and maintenance systems. Workplace health and safety management systems should include at least the following elements:

- Health and Safety policy
- Responsibility and accountability statements for personnel
- Suppliers, sub-contractors, and purchasing controls
- Health and safety consultation mechanisms

- Risk management procedures
- Training, i.e. induction and ongoing
- Incident reporting and investigation procedures
- Emergency planning
- Manual handling and ergonomics
- Hazardous chemicals management
- Noise management
- Specific workplace issues, i.e. infection control, electrical testing, playground management, etc.

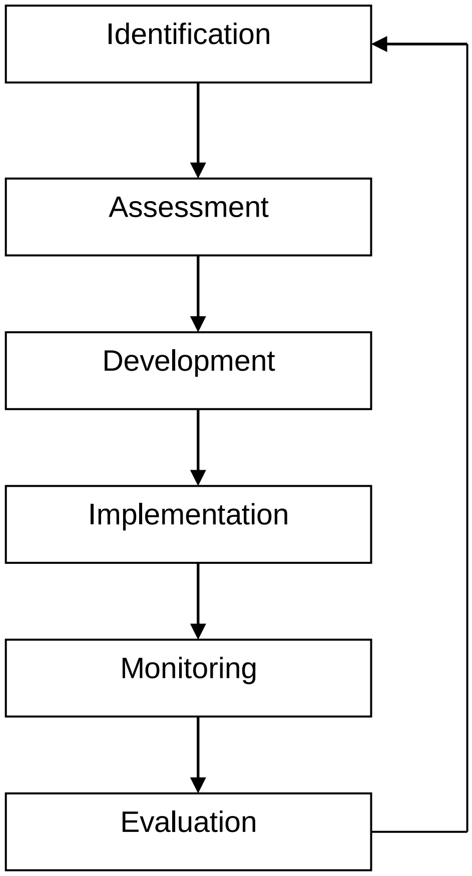
The development of these documented systems should follow a standard format and cover the essential elements of each system. In most organisations, the standard format for procedure development will be as follows:

Example Format for Procedures

- ***Purpose*** – the reason the procedure has been developed.
- ***Scope*** - the departments within the organisation to which the particular procedure applies.
- ***Responsibilities*** **–** this specifies the position descriptions within the organisation and their responsibilities for implementation of the procedure,
- ***Reference Documents*** **–** these are the Regulations, Code of Practices, Australian Standards, etc., that have been used in the development of the procedure.
- ***Definitions*** **–** this section includes the definitions to all words unique to the procedure that require comprehension by the reader.
- ***Policy/Procedure*** – if it is a policy it will detail the organisation's policy to a specific issue, i.e. alcohol, UV radiation, etc. If it is a procedure, it should indicate a step by step procedure on how to comply with the standards. In some instances the procedure will make the use of notes, cautions and warnings to highlight the important steps to the reader. A note will indicate minor injury or illness may result if the procedure is not followed, caution will indicate a serious bodily injury may result, and the warning may indicate failure to comply with the step may result in death.

Effective Workplace Health and Safety Management

To effectively implement a workplace health and safety management system, an organisation needs to adopt a systematic approach. This is best described in the following diagram:



This process of implementation is described as follows:

- **Identification**

  An organisation must identify which systems need to be developed and how they will address the specific hazards that are faced by the organisation.

- **Assessment**

  To prioritise which systems should be implemented first within an organisation requires consideration of both compliance to statutory requirements and the prevention of incidents which will have a significant cost impact to the organisation, i.e. manual handling injuries.

- **Development**

  This step requires the development of an effective procedure designating the purpose, scope, responsibilities, references, definitions and procedure for the effective implementation of the system.

- **Implementation**

  The implementation phase will require the development of an action plan stating who has to do what, by when and how it can be achieved. Management will be required to train key personnel in the system requirements and may be required to allocate resources in both time and facilities.

- **Monitoring**

  This step requires the action plan developed in the implementation phase, to be monitored for its compliance to the established time frames. If the action plan falls behind schedule, management must make a decision to either add additional resources or to modify the action plan accordingly.

- **Evaluation**

  The final step is to evaluate the implemented system to ensure that it meets the requirements it was originally designed for. Evaluation will be an ongoing process as improvements may be identified or statutory standards may change.

REQUIREMENTS

In developing a new policy or procedure, management must ensure that the policy or procedure meets or exceeds the minimum statutory requirements. As previously stated, the WHS Regulations specify the minimum statutory requirements and the Codes of Practice provide advice on how to achieve these minimum standards. As the workplace health and safety legislation is constantly under review, the workplace health and safety policy and procedures manual must be considered to be a ‘fluid’ document. When changes in the legislation occur, management must review the policy or procedure to ensure it maintains compliance with the minimum expected standards. The audit program is one method of ensuring that the existing policies and procedures of an organisation are maintained up to date with the ever changing legislative requirements.

THE AUDIT PROGRAM

Definitions

Audit	An audit is a systematic and independent examination to verify by examination or evaluation of objective evidence, the adequacy of and compliance with established systems. An audit is conducted against defined standards.
Inspection	An assessment of workplace conditions to identify hazards and is usually conducted against a simple itemized checklist.
Major Non-Compliance	Is defined as those issues where the audit determines that the management system does not exist or is inadequate to comply with the requirements of the statutory standards, i.e. absence of an incident reporting system and prescribed incident report form.
Minor Non-Compliance	This is defined as an issue where a single failure to comply with the requirements set out in the standard or the company's own system is judged to be of unacceptable quality without constituting a total systems failure.

AUDIT PURPOSE

OBJECTIVES OF AN AUDIT

Safety auditing is done to identify work procedures that could be changed to assist in creating a healthier and safer work environment for both employees and management.

A well-developed safety audit system will:

- Provide an objective view of the status of workplace health and safety management within an organisation.
- Identify non-compliance in management or control systems and highlight aspects requiring corrective action.
- Recognise success in workplace health and safety management, where the standard has been achieved or exceeded.
- Evaluate the level of compliance/non-compliance with legislative requirements.

TYPES OF AUDITS

There a three types of workplace health and safety audits which can be conducted. These are:

- Management systems audits;
- Compliance audits; and
- Procedural audits.

Management Systems Audit

A management systems audit is an audit that measures the organisation's safety management systems against statutory or recognised best practice standards. These audits also allow the organisation to implement a cycle of continuous improvement, benchmark health and safety performance, and in some instances, gain recognition for the standards achieved by the health and safety management system.

Compliance Audit

A compliance audit simply measures an organisation's compliance to statutory standards. Organisations should conduct their own risk assessments and set their own standards should the statutory standards not minimise the risks to acceptable levels.

Procedural Audit

A procedural audit is one where a specific procedure is audited to determine any deviation from accepted standards. A procedural audit may be done, for example, on incident reporting, hazardous chemicals management, rehabilitation, emergency procedures, plant, etc. If all the procedures that make up the system are audited over a period of time, then a full measurement of the workplace health and safety system will be achieved. However, generally, procedural audits are conducted on one element of the health and safety program within one area of the organisation.

WHAT STANDARDS SHOULD BE USED FOR THE AUDIT?

The audit standard from which to measure can come from the following areas:

- The Organisation's Health and Safety Policy and Procedures Manual;
- The Work Health and Safety Act;
- The Work Health and Safety Regulation;
- Codes of Practice;
- Australian Standards;
- Industry Standards.

The auditor must be aware that if they plan to audit against the organisation's workplace health and safety policy and procedures, then those procedures themselves must meet or exceed the minimum statutory standards. Hence, the auditor must have access to the statute legislation dealing with the topic they are auditing.

If a review of the procedure identifies it is non-compliant with the statute requirements, then a non-conformance report must be raised for management requesting the standard to be updated. Should the procedure exceed the statutory requirements, then this information should also be passed in the audit report to management. If no significant increase in safety or decrease in the level of risk is achieved by exceeding the standard, then the procedure may be reviewed to meet the minimum statutory requirements. .

THE AUDIT PROCESS

The audit process consists of eight phases. They are as follows:

1. Planning
2. Desk top audit
3. Opening meeting
4. Conducting site audit
5. Determine audit findings
6. Closing meeting
7. Reporting
8. Follow up

Each of these phases are discussed in detail in the following text.

PLANNING

Without adequate planning, an audit will have little chance of succeeding. The steps in the planning process are as follows:

Set the Scope of the Audit

In setting the scope, the auditor is required to identify the organisation or part of the organisation to be audited, the type of audit to be used and the specific elements of the safety program to be audited. When setting the scope of the audit, the auditor must consider any limitations imposed by the organisation being audited, such as:

- Time allowed;
- Restrictions on access;
- Special equipment requirements, i.e. personal protective equipment, noise monitors, etc., and
- Confidentiality issues.

Develop Audit Checklists

Many organisations who have documented safety management systems in place have also developed audit checklists for use by auditors. Prior to using these checklists, the auditor must ensure the questions reflect the requirements of the current procedure.

If a standard checklist does not already exist, then an audit checklist will have to be developed with reference to the audit scope. The auditor will prepare the questions by referring to the standards relevant to the topic being assessed.

Select Audit Team

In a small organisation, a single person will generally conduct the audit. In a large organisation, a team approach may be required. In this situation, an audit leader shall be chosen, along with the auditors. Each team member, as well as having a good knowledge of the overall organisational structure and operation, must have good knowledge of legislative and Australian standards requirements. The success of the team approach is largely determined by ensuring that all audit team members clearly understand what task they are to do, how they are to do it, and in what time frame. Common methods and standards of investigation, recording and reporting are essential.

Preparing the Organisation for the Audit

The organisation or department being audited should be notified prior to the audit of the following information:

- The audit topic
- The audit team members
- The requested time and date to conduct the audit
- The access required to conduct the audit
- The people who may be required for interview
- Documentation required for review

DESK TOP AUDIT

If an organisation's workplace health and safety policy and procedures manual is available to the auditor prior to the site visit, a desk top audit can be conducted. The desk top audit will require the auditor to examine the procedure to be audited against the audit standard. This will save time for the auditor on site and may identify major non-compliances with the organisation's procedures.

OPENING THE MEETING

Upon arrival at the audit site the auditor should gather all participants involved in the audit to explain the purpose of the audit, what types of things will be inspected, what types of questions will be asked and an explanation of the report format.

If the auditor or audit team has not been to the premises before, an orientation or induction session may be required. This should be undertaken after the completion of this meeting.

CONDUCT THE AUDIT

To conduct the audit, the auditor will collect objective evidence. This will require the auditor to:

- Examine written records, i.e. incident reports, hazard reports, training records, operating procedures, etc.
- Have direct contact with personnel. This will take the form of observing the workplace and persons performing work and questioning and interviewing staff members.

This part of the audit can be supported by the taking of photographs with time, date stamps, etc.

Interviews

The auditor should conduct interviews with management representatives from the Chief Executive down to supervisory level. Questions on management responsibilities, the decision making process, training, etc., should be asked by the auditor to ascertain management's level of understanding and commitment towards the safety management systems.

Other key personnel to interview during the audit, if they are available, are as follows:

- Work Health and Safety Adviser
- Occupational Health Nurses
- Workplace Health and Safety Representatives
- Rehabilitation Coordinator
- First Aid Officers
- Emergency personnel

As all these people play a specialist role in the management of workplace health and safety systems, their knowledge of how the organisation is performing will be invaluable to the auditor.

During all interviews the auditor should sight and record all documentation such as policies, procedures, training records, etc.

Inspection and Verification

From the interviews and inspection of documentation, the extent of the existing safety management system should have been established. As previously stated, documented procedures and training records are of no benefit to an organisation unless the procedures are implemented and staff understand the requirements. Hence, it is essential that the auditor verify the extent of implementation of the systems within the workplace, i.e. this is the 'seeing is believing' element of the audit.

The inspection verification phase is achieved by a visual inspection of the workplace and by observation of persons performing their work. Again, it is important that photographic evidence be obtained to either confirm the implementation of the systems or identify the deficiencies. If possible, in taking the photographs, people should not be able to be identified.

DETERMINE AUDIT FINDINGS

This phase is effectively the analysis of all the data collected. During this analysis the auditor or auditors will meet to compare their observations and records to determine an overall assessment of the status of the audit item. If non-compliance is identified throughout the audit and deemed by the auditor as serious, i.e. may endanger personnel or property, then the non-compliance should be confirmed with the relevant management member as soon as possible with the aim of stopping that process until the non-compliance is corrected.

CLOSE MEETING

This phase of the audit process requires the auditors to present a verbal report to management on the audit findings. This allows management to question the findings and clarify the situation before it is documented. If applicable, an audit summary of the findings should be provided to attendees at this meeting. The general format for closing the meeting will be as follows:

- Distribute a copy of the audit summary.
- Present a verbal report to the attendees starting with the positives, identifying the deficiencies and finishing with a positive.
- Allow discussion to ensure the findings are clearly understood by all attendees.
- Advise attendees on the estimated date of completion of the written report.
- Thank the attendees for the cooperation and assistance with the audit.

Note: If non-compliance reports were raised during the audit, acknowledgement by the relevant manager or auditee by signing the notice should be undertaken at this meeting.

AUDIT REPORT

The audit report must be delivered to management as agreed during the closing meeting. The audit report is a complete report of the audit findings and should remain unchanged from the information provided in the closing meeting.

FOLLOW UP AUDIT

The final step in the audit process is for the auditor to identify whether the corrective actions raised by the audit have been implemented by management. The corrective actions will remain open until such time that the corrective actions are implemented or management has decided to accept the non-compliance.

Version	Date	Author
1	30/06/2018	WHSQ