

Auditor Competency for Assessing Occupational Health & Safety Management Systems

Introduction

In 1995, ISO began efforts to draft an international occupational health and safety management system (OHSMS) standard. That effort failed. Since that time, a number of countries have developed their own OHSMS guidance standards.¹ In addition, at the international level, the International Labor Organization (ILO) published guidance on Occupational Safety and Health Management Systems in 2001 (ILO-OSH 2001).

In the United States, the ANSI Z10 standard (Occupational Health and Safety Management Systems) was published as a final standard in July of 2005. This standard is formatted into two columns. The left column states the requirements that must be met if an organization wishes to demonstrate its conformance to Z10. The right column provides recommendations and explanatory notes. Some organizations may wish to use the Z10 standard for third-party certification of their OH&S management systems.

Certification is the process by which a party gives written assurance that a product, service, process, system or material conforms to specific requirements, such as those contained in a consensus standard. There are hundreds of certification or registration bodies around the world that certify everything from electronic components and laboratories to management systems. Most of these bodies provide what is known as third-party certification. The fundamental requirement for third-party certification is independence of the registration body from the organization being certified.

In addition to the standards developed through formal standard-setting processes, another OHSMS guidance document was developed by an ad-hoc group – OHSAS 18001:1999. This document, although not an ISO standard, is being used for third-party certification of occupational safety and health management systems. Although it is difficult to determine an exact number, a review of existing information sources indicates that world-wide some 10,000 organizations have sought third-party certification of their OHSMS to OHSAS 18001.

The organizations sponsoring this Position Paper are concerned about the current status of third-party certification of OH&S management systems and auditor certification schemes based on OHSAS 18001. Since OHSAS 18001 is not an ISO standard, the programs and processes in place for certification of ISO 9001 and ISO 14001 management systems do not apply. In addition, there are no internationally-recognized criteria for evaluating the competency of OHSMS auditors.

The purpose of this Position Paper is to provide recommendations concerning the qualifications that should be considered in evaluating the competency of individuals tasked with evaluating occupational health and safety management systems. No matter what standard is used for implementing and evaluating an OHSMS, the individuals conducting third-party conformity assessments need to have certain demonstrated competencies. In particular, they must have knowledge and skills specific to occupational safety and health.

¹ These standards include ANSI Z10:2005, BS 8800:2004, AS/NZ 4804:2001, IRAM 3801:1998, SAZS H11-D807:2003, as well as a standard-setting effort currently underway in Canada (CSA Z1000).

Organizations Sponsoring this Position Paper

Four organizations representing over 30,000 occupational health and safety professionals have joined together in preparing this Position Paper. They are:

American Society of Safety Engineers

Founded in 1911, the American Society of Safety Engineers (ASSE) has more than 30,000 members who manage, supervise and consult on safety, health and environmental issues in industry, insurance, government and education. ASSE participates in the development of safety standards by acting as the secretariat for seven standards committees and serving on 40 other safety standards committees.

For more information about ASSE, visit www.asse.org

American Industrial Hygiene Association

Founded in 1939, the American Industrial Hygiene Association (AIHA) is a non-profit professional association representing 12,000 occupational and environmental health and safety professionals. AIHA has also participated in safety standard development, including acting as the ANSI secretariat for the Z10 Occupational Safety and Health Management System Standard, as well as for the ANSI Z9 and Z88 standards. AIHA operates several well-recognized laboratory accreditation programs that help ensure the quality of the data used in making critical worker protection decisions.

For more information about AIHA, visit www.aiha.org

Board of Certified Safety Professionals

Founded in 1970, The Board of Certified Safety Professionals (BCSP) credentials occupational safety and health practitioners in order to enhance the safety of people, property and the environment. As of the end of 2004, over 10,000 professionals were certified as Certified Safety Professionals (CSP). Individuals holding this certification are required to meet academic and professional experience requirements as well as pass one or two certification exams. The certification exams are developed using formal role delineation and task analysis (RDTA) and formally validated. BCSP holds accreditation from one international and two national organizations that set standards for peer certification boards. In 2003, the CSP designation became one of the first five certifications to achieve accreditation under ANSI/ISO/ISE 17024.

For more information about BCSP, visit www.bcspp.org

American Board of Industrial Hygiene

Founded in 1960, the American Board of Industrial Hygiene (ABIH) was established to improve the practice and educational standards of the profession of industrial hygiene. Over 6,000 individuals are certified as Certified Industrial Hygienists (CIH). Individuals holding the CIH certification are also required to meet academic and professional experience requirements as well as pass a certification exam. Like the BCSP exams, the CIH certification exam is developed

using RDTA – role delineation and task analysis. ABIH holds accreditation from the Council of Engineering and Scientific Specialty Boards which sets standards for peer certification boards. ABIH is currently pursuing accreditation under ANSI/ISO/ISE 17024.

For more information about ABIH, visit www.abih.org

OH&S Auditor Competencies

One of the primary factors ensuring the reliability of an audit process is the competency of those conducting the audit. This is true whether the system being audited is a financial system, a quality or environmental management system, or an occupational health and safety management system.

As with other professions, the competency of management system auditors depends on a demonstration of professional ethics (personal attributes), knowledge and skills. In addition, management system auditors, like other professionals, need to maintain and improve their competency through a program of continued professional development.

The generic knowledge and skills required of quality and environmental management system auditors are set out in ISO 19011:2002. Given the similarities in the auditing knowledge and skills needed when auditing any management system, these generic auditor requirements are likely to be equally applicable to OHSMS auditors as they are auditors of quality and environmental management systems.

This does not mean that auditors qualified to conduct environmental or quality audits are automatically qualified to conduct OHSMS audits. As ISO 19011 recognizes, the specific auditor knowledge and skills required depends on the management system being audited. Following the format set out in ISO 19011 for quality and environmental auditors, the following language articulates the specific knowledge and skills required for OHSMS auditors:

Specific knowledge and skills of occupational health and safety management system auditors

Occupational health and safety management system auditors should have knowledge and skills in the following areas:

a) Occupational health and safety management methods and techniques to enable the auditor to examine occupational health and safety management systems and to generate appropriate audit findings and conclusions. Knowledge and skills in this area should cover:

- Occupational health and safety terminology;
- Occupational health and safety management principles and their application; and,
- Occupational health and safety management tools (including hazard identification and risk assessment, selection and implementation of appropriate hazard controls, developing proactive and reactive performance measures, understanding techniques to encourage employee participation and evaluation of work-related accidents and incidents)

b) Occupational health and safety science and technology to enable the auditor to comprehend the principles of anticipating, evaluating, measuring and controlling hazards in the workplace. Knowledge and skills in this area should cover:

- An understanding of the physical, chemical, and biological hazards and other workplace factors affecting human well-being;
- The potential interactions of humans, machines, processes and the work environment;
- The principles of hazard identification, evaluation, risk assessment and risk communication;
- The various methodologies for exposure monitoring and assessment;
- Life safety and emergency planning principles;
- Medical surveillance methodologies for monitoring human health and well-being;
- The various methodologies for accident and incident investigations; and,
- The various methodologies used to monitor occupational safety and health performance.

c) Previous education and experience enabling the auditor to comprehend and evaluate how the organization's activities, raw materials, production methods and equipment, products, by-products, and business management systems may impact occupational health and safety performance in the workplace. Knowledge and skills in this area should cover:

- Sector-specific terminology;
- Critical characteristics of operational processes, products and services;
- A general knowledge of sector-typical occupational health and safety hazards and risks; and,
- Sector-typical technologies used to prevent occupational injuries and illnesses.

Evaluation of OH&S Auditor Competency

As stated above, we are concerned about the current certification schemes for OH&S management systems. Several studies have raised questions about the value of quality, environmental and occupational health and safety management system certification.

Many of the concerns raised in these studies have focused on the competency of the auditors performing conformity assessment audits. One way of addressing these concerns would be to establish a certification program that provides confidence in the qualifications of OH&S management system auditors. Given the goal of protecting the health and safety of working men and women, ensuring that OH&S auditors are competent is of critical importance.

Although we support the development of a certification program for OH&S management system auditors, such a program must include adequate safeguards to ensure that it is fair, valid and reliable. We oppose the development of a certification program that places unnecessary burdens on the occupational safety and health professionals that our organizations represent. Those who are Certified Safety Professionals and Certified Industrial Hygienists have already demonstrated that they have broad-based OH&S expertise. This should be considered when any OH&S management system auditor certification program is developed.