# Avoid 8 Common Pitfalls When Auditing Your OHS Program



In addition to being <u>legally required</u>, <u>safety audits are vital</u> <u>to OHS program</u> success. That's why 95% of the Fortune 2000 companies perform them. Of course, <u>safety audits</u> are just as critical for medium and small businesses. After all, risk exists at all operations, regardless of size. With audit season in full swing, OHS coordinators need to be careful not to get tripped up by the 8 common pitfalls that can undermine the effectiveness of their own audits.

# Pitfall 1. Confusing Safety Audits with Safety Inspections

The term "safety audit" is often used interchangeably with "safety inspection," notes veteran OHS Management Systems (OHSMS) expert Wayne Pardy. But the 2 aren't the same:

- **Safety inspection** is an examination of actual conditions. It's typically considered a departmental and line management responsibility.
- Safety audit is a systematic and documented evaluation of an organization, system, process, project, or product performed by a competent, independent, objective, and unbiased auditor to verify that the subject of the audit, typically the OHS program or OHSMS, operates according to approved and accepted standards, statutes, regulations, or practices.

## Pitfall 2. Not Using the Safety Audit to Enhance the OHS Program

Pitfall 1 often leads to Pitfall 2. This is likely the case where management makes the common mistake of believing that safety means nothing more than creating and training workers in written policies or procedures. The thinking is that if everybody knows the rules, safety and compliance will be automatic. Of course, this is a flawed assumption. For a workplace to be truly safe and compliant, there must be a set of defined standards or expectations, along with a management system that generates a regular flow of information necessary to monitor and improve those systems against those standards or expectations. And that's precisely what the safety audit provides for.

# Pitfall 3. Not Having Clear Objectives for the Safety Audit

The general aim of an audit is to identify strengths, weaknesses, and main areas of vulnerability and risk, with the objective of minimizing loss through accident and/or plant damage. The primary objectives of a safety audit are to:

- Confirm that OHS program/OHSMS activities and controls are in place to address the identified risks associated with the work performed by the company;
- Verify that the company meets government regulations, as well as voluntary safety standards, internal benchmarks, and/or approved business practices; and
- Assess past and current practices to identify and correct safety issues which, if left unresolved, could result in personal injury, property damage, regulatory penalties, or business interruption.

# Pitfall 4. Not Performing Safety Audits at the Proper Frequency

One key question is how often to perform safety audits. The answer is to audit as often as necessary to determine that the OHS program/OHSMS is being effectively implemented and maintained and meeting its stated objectives, which may include complying with the requirements of CSA Z1000-6 or another voluntary standard. There are many possible approaches. One of the most common is to perform a safety audit once a year and use a scoring system to monitor improvements. Some companies deem full safety audits necessary only once every 2, 3, 4, or even 5 years. Others follow a more fluid approach that determines the timing of future audits by weighing benefits gained against the more frequent checks of compliance offered by an inspection program following the initial audit. Still, other companies perform integrated audits that incorporate not only safety but environmental, quality, and other business improvement processes.

In addition to the regularly scheduled audits, audits should be conducted in response to certain triggering events, including:

- Significant changes to the OHS program, OHSMS, the company, or its operations;
- Identification of irregularities or nonconformities that suggest the existence of a potential hazard or problem area;
- Unusually high worker turnover in a department where health and safety can be jeopardized due to nonconformities; and
- The taking of corrective or preventive action to verify that the problem has been adequately addressed.

#### Pitfall 5. Not Properly Planning the Safety Audit

As with anything, proper execution is crucial to audit effectiveness. The starting point is making an audit plan or protocol that:

- Determines what you want to audit based on a risk analysis or gap analysis;
- Identifies the specific objectives of the audit; and
- Defines the scope of the audit.

## Pitfall 6. Not Covering All of the Bases During the Safety Audit

Be sure that your <u>OHS program audit is comprehensive</u> and doesn't overlook key elements. According to CSA Z1000-06, an audit of a company's OHSMS should cover at least the following elements:

- Management commitment and leadership.
- Worker participation.
- OHS policy.
- Compliance with OHS and other legal and non-legal requirements.
- Hazard and risk identification and assessment.
- OHS objectives and targets.
- Preventive and protective measures.
- Emergency prevention, preparedness and response.
- Competence and training.
- Communication and awareness.
- Procurement and contracting.
- Management of change.
- Monitoring and measurement.
- Incident investigation and analysis.
- Internal audit.

- Preventive and corrective action.
- Management review.
- Continual improvement.
- Review of input.
- Review of output.

#### Pitfall 7. Failure to Report Safety Audit Results

It's essential to create a final report that documents the audit results, including problems identified and corrective actions recommended in a final report. The audit results and conclusions should be communicated to all workplace safety stakeholders, including not just management and corporate decision makers but also workers and the JHSC or safety representative.

#### Pitfall 8. Failure to Take Corrective Action

In addition to leaving workers in danger, failure to take action to correct the hazards and problems the safety audit identifies exposes the company and its leaders to liability for any resulting OHS violations that occur. Accordingly, the OHS coordinator and management should create an action plan listing the necessary corrective actions, how and when they'll be taken, and who's responsible for their implementation. The action plan should also provide for a follow-up audit or inspection to verify that corrective actions have been taken and are effective in resolving the problem.

The audit process culminates in the creation of a written report. This is followed by the development of an action plan agreed upon with local management. The implementation of the action plan must be monitored. A Safety Audit will be carried out by a team of people who are competent and who have a

satisfactory degree of independence from the plant or unit under audit.