

Gap Analysis Guidance

ISO 45001:2018

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1 Introduction

Building an OHSMS (Occupational Health and Safety Management System) that meets the requirements of ISO 45001:2018 can be challenging. If you are in doubt about the interpretation of any particular requirements and your business's current status against it, you should refer to ISO 45002:2023, the guidance standard.

The gap analysis of your management system will provide a high-level overview of your current system against the standard's requirements. It is an ideal solution for organizations that must measure their current state of compliance against the standard and identify the actions required to address any gaps.

The gap analysis checklist is not intended to be a comprehensive verification of all the ISO 45001:2018 standard requirements; however, it will assist you in understanding the effectiveness of your current management system and identify gaps in processes not previously considered.

1.1 Businesses With an Existing OHSMS

For businesses with an existing health and safety management system, you may decide to keep your current health and safety management system and simply amend and adapt it where necessary. Some of you may take this as an opportunity for a complete revamp of the management system. If you have an existing ISO 45001 health and safety management system, then you should:

1. Determine your resourcing requirements to include additional training. (e.g., attending a Managing ISO 45001:2018 or an Internal Auditing course?);
2. Undertake a thorough gap analysis of the existing health and safety management system and supporting business processes using our ISO 45001:2018 Gap Analysis Checklist.docx. Consider all questions in sections 4 to 10 and provide references to your system documented information (as appropriate) in the corresponding column;
3. Develop the ISO 45001:2018 Gap Analysis Action Plan.xlsx. This is the output of the gap analysis and should outline the timeline of actions required to close the gaps;
4. Once the health and safety management system has been updated, 'run' the system for at least four months to embed it into the organization, identify and address nonconformities, and implement any improvement opportunities;
5. Engage with your Certifying body to arrange certification!

Iterative adjustment of new or existing management system documentation should also be expected as staff become accustomed to the requirements and begin to suggest usability improvements. Instant business or operational improvements may initially be observed. The focal points of the key concepts to interpret and implement are:

1. 4.1 Organizational context;
2. 4.2 Interested parties;
3. 6.1.2.1 Hazard identification;
4. 6.1.2.2 Assessment of OHS risks and other risks to the management system;
5. 6.1.2.3 Assessment of OHS opportunities and other opportunities for the management system;
6. 7.5 Documented information;
7. 8.1.2 Eliminating hazards and reducing OHS risks;
8. 8.1.3 Management of change;
9. 8.1.4.1 Procurement;
10. 8.1.4.2 Contractors;

11. 8.1.4.3 Outsourcing.

If you have a compliant health and safety management system, begin with the assumption that you already do most of what ISO 45001:2018 requires. You probably are! Here are some initial review tasks to consider:

1. Identify legal and regulatory compliance requirements related to health and safety management system performance;
2. Compare actual performance with external standards, regulations, codes of practice and guidelines;
3. Identify activities, products, and services that can create health and safety risks and/or pose legal risks;
4. Review existing management procedures;
5. Compare actual operations with internal policies and procedures;
6. Identify policies and procedures dealing with external contracts for services and suppliers;
7. Review investigations of previous incidents, accidents, and 'near misses';
8. Gather the views of internal and external interested parties;
9. Assess if/how other internal systems can help or interfere with health and safety management system performance;
10. Consider 'benchmarking' with another organization's health and safety management system.

If you do it right and understand the requirements, implementation should not be a problem since 75% of your management system is already in place.

1.2 Businesses Without a Management System

For businesses without a formal health and safety management system, conducting a gap analysis is a critical step as it identifies the current status of the existing management system relative to the standard; it provides a foundation for planning the development and implementation of the health and safety management system. If you do not have a safety management system, then you should:

1. Review the ISO 45001:2018 Standard to understand the key requirements;
2. Determine your resourcing requirements to include additional training. (e.g., attending a Managing ISO 45001:2018 or an Internal Auditing course?);
3. Undertake a thorough gap analysis of the existing health and safety management system and supporting business processes using our ISO 45001:2018 Gap Analysis Checklist.docx. Consider all questions in sections 4 to 10 and provide references to your system's documented information (as appropriate) in the corresponding column;
4. Develop the ISO 45001:2018 Gap Analysis Action Plan.xlsx. This gap analysis output should outline the timeline of actions required to close the gaps.
5. Once the health and safety management system has been implemented, 'run' the system for at least 12 months to embed it into the organization, identify and address nonconformities, and implement any improvement opportunities;
6. Appoint a Certifying body to arrange certification!

Information may be in paper or electronic form, and procedures can be interpreted in whatever method best suits your organization's needs, including flow charts, picture diagrams, video imaging, soft copy computer-based procedures, etc.

The primary consideration is that the documented information can be understood and utilized by the appropriate personnel within your organization, which in turn provides the control and continual improvement that the Standard requires.

1. Scope of the health and safety management system;
2. Safety policy and objectives;
3. Safety accountability of the accountable manager;
4. Safety responsibilities of key safety personnel;
5. Documentation control procedures;
6. Hazard identification and risk management schemes;
7. Safety performance monitoring;
8. Incident investigation and reporting;
9. Emergency response planning;
10. Management of change (including organizational changes with regard to safety responsibilities);
11. Safety promotion;
12. Training and communication on safety.

The size and scope of your organization will be critical factors in determining the system's structure. The external auditor must determine compliance with ISO 45001:2018, regardless of how you have put it together.

The benefits of a properly functioning health and safety management system are not just restricted to the knowledge that it complies with regulatory requirements but also has the discipline to manage customer requirements effectively and mitigate risk.

1.3 Gap Analysis Planning

Many people talk about the high cost of implementing management systems, but this is a false assumption. If you do it right and understand the standards, implementation should not be a problem since 75% of your management system is already in place. Here are some initial review tasks to consider:

1. Identify legal and regulatory compliance requirements related to health and safety management system performance;
2. Compare actual performance with external standards, regulations, codes of practice and guidelines;
3. Identify activities, products, and services that can create health and safety risks or pose legal risks;
4. Review existing management procedures;
5. Compare actual operations with internal policies and procedures;
6. Identify policies and procedures dealing with external contracts for services and suppliers;
7. Review investigations of previous incidents, accidents, and 'near misses';
8. Gather the views of internal and external interested parties;
9. Assess if/how other internal systems can help or interfere with performance;
10. Perform a gap analysis to compare what is in place with what ISO 45001 requires.

Implementing a management system like the one detailed in this document will give your organization the foundation to enact a culture change.

It is expected that the culture shift will start during the early development and implementation phase, and by getting involvement and consultation from employees at an early stage, you can more easily secure their buy-