Integrated Management System Guidance
# Integrated Management System Guidance

**ISO 9001:2015, ISO 14001:2015 & OHSAS 18001:2007**

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## 10.0 IMPROVEMENT

### 10.1 GENERAL

### 10.2 NON-CONFORMITY & CORRECTIVE ACTION

### 10.3 CONTINUAL IMPROVEMENT
1 Introduction

The purpose of this document is to outline a potential integrated management system to meet the requirements of ISO 9001:2015, ISO 14001:2015 and OHSAS 18001:2007. The integrated management system is designed to be implemented to function within current business practices and serves as an effective tool to help your business grow and improve.

The application of the integrated management system is scalable and generic; regardless of the size and type of organization. The elements that form a typical EHQMS are the same; please refer to the figure below.

Typical Elements of an Integrated Management System using PDCA

The primary goal is to achieve a set of consistent processes that provide a route for enhancing customer satisfaction, mitigation uncertainty and providing meaningful data for continuous improvement activities.
You may decide to keep your current quality, environmental and health & safety management systems and simply amend them where necessary. Some of you may take this as an opportunity for a complete revamp of the management system. Both courses of action are entirely reasonable, and this guidance document will guide you through what the essential elements that you need to address in order become certified.

The integrated management system includes the processes and procedures required to achieve compliance to quality, environmental and health and safety requirements, as well as, highlight their interaction with other support processes. Top management must take responsibility for leadership, commitment and take active involvement for developing and maintaining the management system. It is necessary to have well defined processes, both operational and support, to be able to realize the product or service. Customer satisfaction has to be measured and analyzed so that the organization can be improved continually.

The implementation of a formal management system is best handled as a specific project that is led by someone with project management experience. Ideally they should be a key member of the organization’s management team and have sufficient authority and trust of the personnel involved. In the ideal situation this person will also be the Management Representative, but skills in project management are highly beneficial.

Integration itself is not difficult to implement but rather, the concepts themselves are sometimes difficult to interpret and can therefore be difficult to apply in the real world. For instance, concepts such as non-conformances, hazards, impacts and corrective action systems might seem burdensome at first but the outputs of these concepts will soon be an invaluable source of information that should be used to drive your corporate objectives. In order implement the integrated management system, we recommend that you follow the steps in this guidance documents.

1.1 Implementation & Development

Begin with the assumption that you are already doing most of what ISO requires, you probably are! 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, then 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 EHQMS performance;
2. Compare actual performance with external standards, regulations, codes of practice and guidelines;
3. Identify activities, products, services that cause impacts on the environment and/or pose legal risks;
4. Identify activities, products, services that can create health and safety risks and/or pose legal risks;
5. Review existing management procedures;
6. Compare actual operations with internal policies and procedures;
7. Identify policies and procedures dealing with external contracts for services and suppliers;
8. Review investigations of previous EH&S incidents, accidents and ‘near misses’;
9. Gather the views of internal and external interested parties;
10. Assess if/how other internal systems can help or interfere with EHQMS performance;
11. Do a gap analysis comparing what is in place with what ISO 9001, 14001 and OHSAS 18001 require;
12. Consider ‘benchmarking’ with other organizations’ EHQMS.
By implementing a management system like the one detailed in this document, your organization will have the necessary 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 the employees at this early stage, you can more easily secure buy in by assigning responsibility and utilising their skills, knowledge and experience to help develop the management system.

1.2 Managing the Change

The organizational migration from a pre-certification state to one that operates within the rigors of an ISO based management system is not a casual task. There must be a tightening of how processes are managed and there are often changes in staff interactions, responsibilities and accountability. Such changes are unlikely to succeed without the dedicated support of both the executive and operational management.

The greatest resource of any company are its people, so strategies for managing both real and perceived change, or concerns and attitudes, should be addressed during the initial planning of the EHQMS. It is likely that during the first few months, Top management will need to positively reinforce its requirements on a routine basis to ensure that staff maintain motivation and do not lapse back into old habits.

Iterative adjustment of new or existing management system documentation should also be expected as staff become accustomed to the requirements and begin to suggest improvements in usability. Instant business or operational improvements may initially be observed. The benefits of a properly functioning EHQMS are not just restricted to the knowledge that it complies with regulatory requirements but that it has the discipline to manage customer requirements effectively and to mitigate risk.

1.3 Top Management Commitment

Implementation takes time, money and other resources. Make sure you have Top management’s commitment before continuing the implementation project. Be sure that Top management are solidly behind implementation of the EHQMS because without that commitment, the implementation process becomes almost impossible. Top management should demonstrate their initial commitment to the implementation project by the ensuring that:

1. The implementation mandate is communicated and understood;
2. Appropriate resources are made available;
3. An appropriate budget is made available.

Understand why your organization is implementing an integrated management system. Is it because a client or the market requires you to register? Is it for internal benefits? Is the motivation coming from top management? Whatever the reasons for implementation, keep them visible during the implementation project as this helps to retain commitment and to maintain focus on the end goal.

It will no longer be appropriate to have one representative driving the EHQMS on behalf of the rest of the organisation. Top management is accountable for the success of the EHQMS and as such should lead, promote and direct others to ensure it drives quality, environmental, health & safety, business benefits.

This is a significant change from the requirements of ISO 9001:2008 and ISO 14001:2004 where Top management appointed a Management Representative; signed the policies and attended management review meetings. Top management can be one or more people but must have cross-functional influence in
order to integrate the EHQMS with current business processes and to ensure EHQMS compatibility with your organization’s strategic direction.

1.4 Senior Management Engagement

The first step in engagement could be to brief your senior team on the changes. Attendance should be encouraged as failure to transition effectively could mean the loss of the ISO accreditation certificates. However, on a more positive note, for many organizations the new standards could act as a watershed moment where the environment plays a significant part in generating value for your organization. Engagement can be further enhanced by reviewing the quality, environmental and safety achievements of your organization. These are often greater and broader than expected because the initiatives are categorised under economic rather than quality or environmental improvement. This realisation builds commitment to do more. By developing engagement the senior team are more likely to contribute to the other changes such as the context review and stakeholder analysis.

1.5 Implementation Team

Top management should consider creating an Implementation Team to assist in developing the new management system. This decision should be based on the size of the organization or facility that will be implementing the EHQMS. This team should consist of key individuals from various divisions, departments, and operating work areas from within your organization who are familiar with the facility and the various processes within. Diversity among team members will bring together a pool of expertise and ideas from which to develop and implement the EHQMS.

One of the key moments in the implementation process is defining the individual responsibility of management and employees for the introduction of different elements into current working process. That is why the most experienced employees from the company should be involved in this process. Following this methodology, a team of experienced and engaged key personnel should be formed at the beginning of the implementation process. The implementation team should include personnel that have the authority to devote resources to the project and to remove roadblocks.

The implementation team should meet on an ‘as needed’ basis according to the project timeline. When the implementation team meets they must address the items on their task list. Spread out the implementation team meetings along the implantation timeline so you do not have too many meeting at one time. For example, you may want to have the document control team meet early in the project to establish a system to collect and control the documents that will be generated. Whereas, the internal audit team would meet later in the process because audits will not begin until the system is complete.

For certain activities, consulting organizations may provide expertise and guidance, which can be useful in the implementation of the EHQMS. However, internal staff should be involved throughout the process because they will need to operate the EHQMS on a daily basis.

1.6 Gap Analysis

Prior to commencing your transition to the new standards, you should answer the following questions; a ‘no’ indicates a gap and an area you will need to concentrate on.

1. Are Top management engaged and involved with the EHQMS?
2. In addition to existing quality/environmental/health and safety functions/teams, are other functions involved with the EHQMS; e.g. procurement, design, production, finance, HR and operations?

3. Is the management system integrated with business processes such as project sign off, competency matrices, procurement requirements and business communications and meetings?

4. Does your EHQMS take account of the risks and opportunities resulting from trends, macro environmental or big picture issues (political, economic, social, etc.)?

5. Does the EHQMS consider the impact of a changing environment on your organisation?

6. Do the requirements of internal and external stakeholders help shape the EHQMS?

7. Is there an existing environmental or safety communication plan (formal or informal) in place?

8. Are robust monitoring and measurement and internal audit procedures in place to ensure quality, environmental, and health & safety data is reliable?

9. Are environmental aspects considered at each stage of the lifecycle?

10. Are health and safety hazards considered during routine and non-routine operations?

11. Are environmental, health & safety, and quality requirements imposed upon contractors and suppliers?

12. Is information on significant impacts and hazards made available to end users and those involved with final disposal and transport of your products or services?

The knowledge obtained about the status your existing management system will be a key driver of the subsequent implementation approach. Armed with this knowledge, it allows you to establish accurate budgets, timelines and expectations which are proportional to the state of your current management system when directly compared to the requirements of the standards.

Your organization may already have in place a management system or parts of a system. If this is the case, you will want to determine how closely your system conforms to the requirements ISO 9001, ISO 14001 and OHSAS 18001.

The results of a gap analysis exercise will help to determine the differences, or gaps, between your existing management system and the requirements of the standards. Not only will this analysis identify the gaps, but it also should determine the size of the gaps. These findings will lead to recommendations, project plans, and the identification of necessary resources for filling the gaps.

The gap analysis output also provides a valuable baseline for the implementation process as a whole and for measuring progress. Try to understand each business process in context of each of the requirements of the standards by comparing different activities and processes with what the standards requires. At the end of this activity you will have a list of activities and processes that comply and ones that do not comply. The latter list now becomes the target of your implementation plan.

Use the gap analysis checklists to compare the requirements of the standard against your organization’s existing management system. Each question in the checklist refers to a requirement that must be met in order to comply with ISO 9001:2015, ISO 14001:2015 and OHSAS 18001:2007.

At the end of this activity you will have a list of activities and processes that comply and a lift of processes that do not comply. The latter list now becomes your action plan. Also consider the effectiveness of what’s being practiced on a day to day basis. It is not unusual for an organization to overlook something which needs some work to make it effective. Congratulations, you have just conducted the first audit of your new management system!
1.7 Team Meetings

After the Implementation Team members have been selected, an initial orientation meeting should be held. At the meeting, everyone involved should be informed of the organization's planned implementation as well as team members' new responsibilities.

The initial orientation meetings will get the programme off to a good start, but many more meetings will be necessary. While the primary activities taking place during the early meetings will involve system development and implementation, the Team Leader may also wish to use this time to provide team members with some training.

The Implementation Team should meet on a regular basis to resolve problems and to report progress. Meeting minutes should be documented as they may prove helpful when working with Certification Auditors. In some cases, auditors' questions may be answered by the documented meeting notes.

1.8 Choosing your Registrar

The registrar is a third-party certification auditor who will formally assess your management system and issue a certificate if the system meets the requirements of ISO 9001:2015, ISO 14001:2015 and OHSAS 18001:2007. When choosing a registrar, you should consider their industry experience, geographic coverage, price and service level offered. The key is to find a registrar who can meet your requirements and who is able to certify against all three standards. For further information regarding accredited certification bodies, please see the following:

Within the UK: [www.ukas.org](http://www.ukas.org)  [www.irca.org](http://www.irca.org)

Different organizations look at their registrations differently; some organizations prefer to have multiple business units or locations on a single certificate. You can register one location in an organization or you can register the entire organization.

You can even, theoretically, register one part of an individual facility. You should address this issue in your registration scope statement. You should discuss the scope of registration very early in your contact with the registrar, prior to or during the selection process.

The scope of registration and certification will need to reflect precisely and clearly the activities covered by your organization's EHQMS; any exclusion to non-applicable requirements of the standards should be documented and justified in the EHQMS manual. No single business-related activity should exist outside of the scope.
2 Documented Information

The extent of the documented information will differ from your organization to another because of to the
size of organization and its activities, processes, products and services; the complexity of processes and their
interactions, and the competence of personnel.

In ISO 9001:2008, the quality manual helped to establish and document the framework of your organization's
quality management system while articulating those aspects of the management system to any interested
parties. While there is no requirement for a management system manual or even documented procedures in
ISO 9001:2015 or ISO 14001:2015, it is suggested that if your existing documentation adds value, then they
should not simply be binned. You will be expected to maintain the integrity of the management system
during the transition process. Remember, you will still need to retain the documented procedures that are
mandated by OHSAS 18001.

You do not need to renumber your existing documentation to correspond to the new clauses. It is down to
each organization to determine whether the benefits gained from renumbering will exceed the effort
involved. Neither do you need to restructure your management system to follow the sequence of and titles
of the requirements. Providing all of the requirements contained in ISO 9001:2015, ISO 14001:2015 and
OHSAS 18001:2007 are met, your organization’s management system will be compliant.

1. If your system manual fits your business and your customers or regulators require it, keep it!
2. If your procedures are effective and define how your key processes operate, keep them!
3. If the policies and related objectives align with current business strategy, and they are communicated
   and adding value, keep those too!

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<td>Quality, environmental, and health &amp; safety policies</td>
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<tr>
<td>Information about an organization’s compliance obligations</td>
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<td>EHQMS objectives</td>
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<td>Evidence of competence of people doing work under the control of the organization that affects the performance and effectiveness of the EHQMS</td>
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<td>Evidence of communications to external parties and interested parties</td>
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<td>Records of design and development inputs</td>
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<td>Records of the activities of design and development controls</td>
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<td>Design and development changes, including the results of the review and the authorization of the changes and necessary actions</td>
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<td>Records of the evaluation, selection, monitoring of performance and re-evaluation of external providers and any actions arising</td>
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<tr>
<td>Evidence of the unique identification of outputs when traceability is a requirement</td>
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<td>Records of property of the customer or external provider that is lost, damaged or non-conforming and of its communication to the owner</td>
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<tr>
<td>Results of the review of changes for production or service provision, the persons authorizing the change, and necessary actions taken</td>
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<tr>
<td>Records of authorized release of products for delivery to the customer including acceptance criteria and traceability to the authorizing person(s)</td>
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<td>Records of non-conformities, actions taken, concessions and the identity of the authority deciding the action in respect of the nonconformity</td>
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