NABCB Policy for Migration to ISO 45001: 2018

1. Background information

1. ISO 45001 Standard on OHSMS has been published in March 2018. This requirement standard has been published by the International Organization for Standardization (ISO) under the ISO Technical Committee, ISO/PC 283.

2. The standard specifies requirements for an Occupational Health and Safety (OH&S) Management System, with guidance for its use, to enable an organization to proactively improve its OH&S performance in preventing injury and ill-health. It enables an organization, through its OH&S management system, to integrate other aspects of health and safety, such as worker wellness/wellbeing; however, it should be noted that an organization can be required by applicable legal requirements to also address such issues.

3. The standard follows the normal Plan-Do-Check-Act (PDCA) model, which provides a framework for organizations to minimize the risk of harm. Although this focus on risk is not new, the emphasis in ISO 45001 on a risk-based approach places the standard more in line with ISO 9001:2015 and ISO 14001:2015, which also take risk as their starting point.

2. IAF Policy

2.1 IAF has published IAF MD 21 “Requirements for the migration to ISO 45001:2018 from OHSAS 18001:2007 applicable from March 2018” This document provides guidance for migration from OHSAS 18001:2007 to ISO 45001:2018. It has included specific guidance for transition for Organizations using OHSAS 18001:2007, for Certification Bodies and for Accreditation bodies.

2.2 Migration Period

The International Accreditation Forum (IAF) has agreed to a three year transition period from the publication date of ISO 45001:2018.

IAF Resolution 2016-15 was passed by the IAF General Assembly in Delhi, India on 4th November 2016 endorsing a 3-year migration period to ISO 45001:2018 from the date of publication (31 March 2018).
2.3 Validity of certifications to OHSAS 18001:2007

OHSAS 18001:2007 certifications will not be valid after three years from publication of ISO 45001:2018 (31 March 2021).

The expiry date of certifications to OHSAS 18001:2007 issued during the transition period shall correspond to the end of the three year transition period (31 March 2021).

Where local legislation/regulation requires accredited OHSMS certification and the legislation/regulation has not been amended to reference ISO 45001, the validity of accredited certification to BS OHSAS 18001 (or national equivalent standard) may be extended.

3. NABCB Plan for Migration

3.1 NABCB has decided to follow the requirements provided in IAF MD 21:2018. Consolidated and simplified process steps have been described below:

3.2 Guidance for Certification Bodies – The certification bodies are expected to follow as given below:

(i) Accredited certifications to ISO 45001:2018 shall only be issued once the CB has been accredited to deliver certification to the new standard and after the organization has demonstrated conformity to ISO 45001:2018
(ii) CBs can conduct migration activities during a routine surveillance, recertification audit or a special audit.
(iii) Where migration audits are carried out in conjunction with scheduled surveillance or recertification (i.e. progressive or staged approach) then a minimum of 1 auditor man-day is required to be added to cover existing and new requirements implied by ISO 45001:2018.
(iv) Recognizing that each client and migration audit is unique, the audit duration will be increased above the minimum as needed to sufficiently demonstrate conformity to ISO 45001:2018. CB’s shall communicate their migration arrangements to their clients at the earliest
(v) CB’s shall develop migration plans to address the following:

   (i) Arrangements for communicating with its clients.
   (ii) Training and verification of competence of auditors and other staff.
   (iii) Arrangements for auditing conformity to the new standard. For example, will it be a single visit or a staged approach.
   (iv) How the CB will ensure clients’ ongoing conformity to OHSAS 18001:2007 through the migration process.
   (v) How the CB plans to use the results of any evaluation activities conducted
during the DIS or latest draft stage document before the IS 45001 was published, if any.

(vi) Action to be taken in respect of clients that have failed to complete the migration by three years after the publication of ISO 45001:2018. For example, the level of audit necessary for certification to be restored.

3.3 CB shall also ensure the following:

(i) All issues that require client action for conformity with the new requirements shall be clearly identified and raised as documented findings

(ii) Only when all identified outstanding issues have been appropriately addressed and the effectiveness of the management system demonstrated, can auditors recommend certification to the published ISO 45001:2018 standard.

(iii) Records shall be available to verify that all prior migration audit findings have been evaluated for corrective action and conformity before any recommendation for approval to ISO 45001:2018 can be made.

(iv) The evaluation of a client’s conformity to the new requirements during the migration phase does not interfere with the client’s on-going conformity to OHSAS 18001:2007.

(v) The decision to issue certification to ISO 45001:2018 shall only be made once actions in respect of all outstanding major non-conformities have been reviewed, accepted and verified and the client’s corrective action plan for any minor non-conformities has been reviewed and accepted.

3.4 Steps planned to be taken by NABCB

The following items will be considered by NABCB AT while assessing migration, through offsite document review, onsite assessment and witness assessments as applicable:

(i) Adequacy of the migration plan drawn out by the CB to ensure smooth migration of its clients to the standard ISO 45001: 2018 and its implementation.

(ii) Adequacy of the changes made by the CB in its documentation system (including procedures, format, etc) reflecting the changed requirements, to ensure effective migration and the implementation of the documented system.

(iii) Implementation of IAF MD 22

(iv) Training and verification of competence of assessors and other staff, including the training related to auditing of control of OH&S risks.

(v) Demonstration of appropriate skills and knowledge, as identified by the CB, based on the requirements of ISO 17021-10 including evaluation of achieved competence. Identification of competence criteria (Skills and knowledge) shall include all functions of the CB involved in certification activities.

(vi) Assessments that include the migration to ISO 45001:2018 shall focus on changes to be implemented by CBs as a result of implementing the new
standard; primary consideration will be given to consistent interpretation of the requirements, competence, reporting and any associated change in audit methodology. The assessment will also review the CB’s arrangements for migrating its clients.

(vii) For accredited OHSAS 18001:2007 CBs that have issued only accredited OHSAS 18001:2007 certificates, at a minimum NABCB shall conduct a documentation review for a minimum of one assessor man-day. This can be done during an onsite assessment, if desired by the CB.

a) If the output of the review is positive the new accreditation certificate may be issued
b) If the output is negative, NABCB will decide about any additional evaluation needed (i.e. additional documentation review or an office assessment or witnessing an audit conducted by the CB)

4.0 Implementation:

Keeping in view the processing times for new applications, NABCB has approved the following policy for transition;

1. All CBs, accredited/applicants to ISO/IEC 17021-1 for OHSMS scheme, shall submit a plan for migration by 30 September 2018. The plan shall clearly indicate the date by which the CB would migrate to ISO 45001:2018.

2. Any application for accreditation pending on 31 March 2019 shall be processed for accreditation only after the CB demonstrates that it has switched to ISO 45001:2018.

3. All applications after 31 March 2019 would be accepted for certification to ISO 45001:2018.

4. All assessments of accredited/applicant CBs, after 31 March 2019, shall be as for certification as per ISO 45001:2018. Any request for assessment before this date for certification against ISO 45001:2018 shall be accepted.

5. Any non-compliance relating to implementation of the revised version of ISO 45001:2018 shall be raised as Concern till 30 September 2019 after which they shall be raised/upgraded as NCs and would have to be addressed by CBs within prescribed timelines.

6. After 30 September 2019, CBs shall conduct all OHSMS initial, surveillance, and recertification audits to the new standard (ISO 45001:2018). The outcomes of such audits shall be considered by the CB for further decision on accredited certifications to ISO 45001:2018 as deemed appropriate.
7. Since IAF has declared a 3 year migration policy from March 2018 (date of publication of the ISO 45001 standard), the above arrangement of timing the migration assessment (document review) would continue till **30 September 2020**. Thereafter, CBs who have not followed up on informing the changes and getting the changes reviewed, would be subject to a special office assessment organized for the migration as per item **3.4 (vii)** described above.

This policy shall apply to all accredited and applicant certification bodies (CBs) seeking accreditation by NABCB for the provision of OHSMS certification.

This policy shall remain current until **31 March 2021**.

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