

Insight aims to provide useful information, links and tips in the areas of Risk Management, Work Health and Safety, Business Continuity Management, and other areas relating to management systems and corporate governance.

Don't Let Your Management System Hang You Out to Dry

Maintaining your safety, environmental and quality management systems is a big job. In many cases it is a full-time occupation and most organisations strive to develop and maintain a management system that aligns with "best practice". Its success or failure is measured directly by its use and application by those that rely on it, including the workers at the point of risk.

Internal and external reviews and audits are often undertaken to verify the system's performance and the assessment goes something like this:

1. There is or isn't a system
2. People know or don't know it
3. People use or don't use it
4. It works or doesn't work (it meets or doesn't meet its intended objectives).

Audits (either internal or external) seek to determine whether the system as written is compliant with the relevant requirements, but also whether the workers know and use the management system. If the system requires workers to wear pink hats, this is what an auditor will be looking for. If the system requires workers to undertake three site inspections per day, this is what an auditor will be looking for. If the system requires unicorns and rainbows, then this is what the auditor will be looking for!

And this is where things usually go amiss. Workers almost always look to get the job done in the most time-efficient and easiest way. If system documents are lengthy, contain unreasonable or unnecessary steps, are not clear and concise, or are difficult to locate or access, then human nature tends to kick in and bypass these. Local solutions (or workarounds) are then developed that in most cases do the job efficiently and at most times, safely, but the problem remains – the theory (i.e. management system as written) says one thing, but the practice does another. And that is how your management system

will hang you out to dry when the Auditor comes knocking – or worse, the Regulator when a serious incident occurs.

Of course, there are legislative compliance requirements when it comes to safety and environmental management. There are also Australian Standard and ISO requirements that HSEQ management systems must include if certification or compliance with these Standards is desired. Sometimes what your system says will be legislative- and Standards-driven, and at other times it will be worker- and practice-driven. Either way, at the end of the day, it is essential that what is documented within the system is what occurs in reality.



Internal audits and inspections are your way of identifying these non-compliances before it matters most. These activities are not just checklist compliance tick and flicks, these are also opportunities to talk to workers and to understand why work activities are deviating from the documented process or procedure. The answers here might surprise you and will lead you down different paths to rectification. Talking with your workers and involving them in the solution is paramount to gaining worker commitment, long-term management system compliance and ultimately (in the case of WHS Management Systems) safer workplaces.

Please [contact QRMC](#) for more information.

Managing Corrective and Preventative Actions

Whether its safety, quality or environmental management, a key indicator of an organisation's performance is how it manages its corrective and preventative actions. These arise, usually as a result of one of three things occurring:

1. A workplace incident or complaint,
2. An audit or inspection identifying a non-conformance with system requirements, or
3. Worker identified issues or improvement opportunities.

The corrective component is an action intended for immediate rectification of the incident or issue. The preventative component is an action or actions that may take some time to be implemented and are intended to prevent recurrence. Regardless of how these are identified, it is vital that accountability for the implementation of corrective and preventative actions is held at the *appropriate* level and actions are completed in a *timely* manner.

It's a matter of risk.....

To help understand what "appropriate" and "timely" mean in this context, it comes down to the level of risk associated with the activity that led to the incident, issue, complaint, non-conformance or hazard.

For example, for an incident where a worker has fallen off a roof and sustained a broken leg, it is reasonable to say that the activity of working on the roof is high or even extreme risk. Let's also say that one of the preventative actions arising from the subsequent incident investigation is the installation of fall-prevention barriers (which were not in use at the time of the incident). Given the level of risk of the activity (high/extreme), the *appropriate* accountability for ensuring the installation of the barriers is most likely to be a Senior Manager or even Executive Manager, depending on your organisation's size and risk management system. A commonly used term for the person and role in this instance is the "Risk Owner". Why? Because they have the decision-making authority and budget to allocate resourcing to complete the nominated action. Again, depending on the organisation, this person and role may also have duties under the WHS Act that obligate that Manager to ensure the health and safety of persons at the workplace.

Defining what constitutes a "timely" completion of the action is dependent not only on the level of risk (i.e. the greater the risk, the sooner the need for completion), but needs to consider the organisation's wider needs. In the example above, how essential to the organisation is the need for people to work on the roof? Can another method or access be adopted in the interim? What risk is posed by not completing the action within a certain timeframe? Does the organisation have the knowledge and resourcing (personnel and money) to complete the action? The timeframe for completion of corrective and preventative actions is therefore a product of risk, organisational needs knowledge and resourcing.



How often does your organisation look at its Open Corrective and Preventative Actions?

It's often said that near-hits and incidents provide learning opportunities to take actions that prevent something more serious from happening. How do you think the WHS Regulator would respond if the organisation in the example above had a second person fall from the roof prior to the completion of the installation of the fall-prevention barriers? You'd have to ask, how were workers allowed to access the roof given the barriers were not yet installed. And then it comes out that no-one was routinely monitoring the organisation's open corrective and preventative actions to ensure these remained on track and progressing towards completion. How often does your organisation look at its open actions – particularly those that relate to a high or extreme risk? Do you maintain a Corrective Actions Register or other solution that tracks and escalates open actions? If you are not reviewing these at least monthly and ensuring they remain on track, and following up when they are not, you could be leaving yourself open to further incidents, complaints and legislative breaches.

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