

ISO 45001 gap analysis checklist

ISO 45001:2018 – Occupational health and safety management systems

For each requirement, record whether your organisation conforms, partly conforms or has a gap, and note the evidence (documents, records, interviews) that supports your answer. To score the results, track corrective actions and produce a report automatically, use the free online Gap Assessment at paperwingpdf.com/iso-gap-assessment/ – it runs in your browser and nothing is uploaded.

Organisation: _____ Assessed by: _____ Date: _____

4.1 Context — OH&S context (internal & external issues)

Identify internal issues (workforce composition, culture, OH&S performance history, existing controls, trade union arrangements, shift patterns) and external issues (legal/regulatory requirements, climate and physical environment risks, community expectations, supply chain OH&S performance, sector incident statistics). Review when significant change occurs. Link context outputs to the hazard identification and risk assessment process (clause 6.1).

☐ Conforms ☐ Partly ☐ Gap ☐ Not applicable

Evidence / notes: _____

4.2 Context — Interested parties (including workers & their representatives)

Identify all interested parties relevant to the OHSMS: workers (including contractors and agency workers), workers' representatives/trade unions, regulators, enforcement authorities, insurers, community, customers, and other organisations sharing the workplace. Document their needs and expectations including legal obligations. Worker consultation is a mandatory element — document how workers' views are sought and incorporated into OHSMS decisions.

☐ Conforms ☐ Partly ☐ Gap ☐ Not applicable

Evidence / notes: _____

4.3 Context — OHSMS scope

Define the OHSMS scope in documented form — specifying organisational units, functions, physical locations, activities, and workers included. The scope must include all activities and workplaces where the organisation has control or influence over OH&S outcomes. Exclusions must be justified and not undermine the organisation's obligations or workers' safety. The scope must be available as documented information.

☐ Conforms ☐ Partly ☐ Gap ☐ Not applicable

Evidence / notes: _____

4.4 Context — OHSMS processes

Establish, implement, maintain, and continually improve the OHSMS including all processes and their interactions. Determine process inputs, outputs, sequence, criteria, resources, responsibilities, risks, and how processes are controlled. Include outsourced processes. Maintain a process map or equivalent showing the OHSMS process landscape. Demonstrate active management rather than a static document set.

☐ Conforms ☐ Partly ☐ Gap ☐ Not applicable

Evidence / notes: _____

5.1 Leadership — OH&S commitment

Top management must demonstrate leadership through: overall responsibility and accountability for prevention of injury and ill-health; ensuring OH&S policy and objectives are established and compatible with strategic direction; integrating OHSMS into business processes; providing resources; communicating OH&S importance; ensuring OHSMS achieves intended outcomes; directing and supporting people; ensuring and promoting continual improvement; supporting other management roles. Evidence: executive participation in safety walks, incident reviews, resource allocation decisions, and management review.

☐ Conforms ☐ Partly ☐ Gap ☐ Not applicable

Evidence / notes: _____

5.2 Leadership — OH&S policy

Top management must establish an OH&S policy that: commits to providing safe and healthy working conditions to prevent injury and ill-health; provides a framework for OH&S objectives; commits to fulfilling legal requirements and other OH&S requirements; commits to eliminate hazards and reduce OH&S risks; commits to worker consultation and participation; commits to continual improvement. Policy must be available as documented information, communicated in all languages used by the workforce, and available to interested parties.

☐ Conforms ☐ Partly ☐ Gap ☐ Not applicable

Evidence / notes: _____

5.3 Leadership — Roles, responsibilities & authorities

Assign, document, and communicate OH&S roles and responsibilities across the organisation. Ensure persons are accountable for OHSMS conformance, performance, and reporting of OH&S performance to top management. Document a RACI matrix for OHSMS processes. All workers must know their OH&S responsibilities. Ensure contractors and on-site third parties have clearly defined OH&S responsibilities. Review assignment when personnel or structure changes.

☐ Conforms ☐ Partly ☐ Gap ☐ Not applicable

Evidence / notes: _____

5.4 Leadership — Worker consultation & participation

Establish, implement, and maintain processes for consultation and active participation of workers and workers' representatives in the OHSMS at all applicable levels. Consultation means two-way communication — workers must have the opportunity to influence OH&S decisions. Participation includes involvement in: hazard identification and risk assessment, determining controls, identifying competence needs, reviewing incidents, identifying improvement opportunities. Document how consultation is conducted and how worker input is addressed. Evidence: joint safety committees, safety walkthrough records, toolbox talk participation records.

☐ Conforms ☐ Partly ☐ Gap ☐ Not applicable

Evidence / notes: _____

6.1 Planning — Hazard identification, risk assessment & compliance obligations

Establish proactive, ongoing processes to identify hazards (covering all activities, routine and non-routine, emergency situations, human factors, and infrastructure). Assess OH&S risks using a documented methodology (e.g. risk matrix, bowtie, HAZOP). Evaluate OH&S opportunities. Identify and maintain a register of applicable legal requirements and other OH&S obligations (licences, codes of practice, industry standards, contractual requirements). Update hazard register when changes occur (clause 8.1.3 management of change). Document and retain all risk assessment records.

☐ Conforms ☐ Partly ☐ Gap ☐ Not applicable

Evidence / notes: _____

6.1.4 Planning — Action planning for risks & opportunities

Determine actions to address identified OH&S risks and opportunities, legal requirements, and other OH&S requirements. Actions must be proportionate to the potential impact. Integrate actions into OHSMS processes. Evaluate effectiveness of actions. Apply the hierarchy of controls: eliminate, substitute, engineering controls, administrative controls, personal protective equipment — in that order. Document the rationale for control selection.

☐ Conforms ☐ Partly ☐ Gap ☐ Not applicable

Evidence / notes: _____

6.2 Planning — OH&S objectives & plans

Establish measurable OH&S objectives at relevant functions and levels, consistent with the OH&S policy, taking into account risks/opportunities and legal requirements. For each objective document: what will be done, resources, responsibility, timeline, monitoring method, and how results will be evaluated. Include leading indicators (near-miss rates, inspection completion, training compliance) as well as lagging indicators (injury rates, RIDDOR reportable incidents). Maintain an objectives register with trend data.

☐ Conforms ☐ Partly ☐ Gap ☐ Not applicable

Evidence / notes: _____

7.1 Support — Resources

Determine and provide resources to establish, implement, maintain, and continually improve the OHSMS: competent people, infrastructure (safe buildings, equipment, emergency systems), suitable work environment, and monitoring/measuring equipment. Maintain calibration records for OH&S monitoring equipment. Ensure financial resources are allocated to OH&S control measures. Demonstrate resource adequacy to external auditors through budget evidence and staffing levels relative to risk profile.

☐ Conforms ☐ Partly ☐ Gap ☐ Not applicable

Evidence / notes: _____

7.2 Support — Competence

Determine and ensure the competence of workers (and others under the organisation's control) needed to perform OH&S-related work safely. Ensure competence through appropriate education, training, and experience. Address competence gaps with documented training plans. Evaluate training effectiveness through testing, observation, or performance data. Retain competency matrices, training records, and assessment results. Give specific attention to competence of: first aiders, fire wardens, forklift operators, confined space workers, and other safety-critical roles.

☐ Conforms ☐ Partly ☐ Gap ☐ Not applicable

Evidence / notes: _____

7.3 Support — Awareness

Ensure all persons under the organisation's control are aware of: the policy; relevant objectives; their contribution to system effectiveness; and the implications of not conforming to requirements. Implement and document an awareness programme (induction, refresher training, team briefings). Retain completion records.

☐ Conforms ☐ Partly ☐ Gap ☐ Not applicable

Evidence / notes: _____

7.4 Support — Communication

Determine what needs to be communicated internally and externally, when, with whom, how, and by whom. Maintain a communications plan. Retain records of significant communications relevant to the system. Ensure communications support system understanding and stakeholder confidence.

☐ Conforms ☐ Partly ☐ Gap ☐ Not applicable

Evidence / notes: _____

7.5 Support — Documented information

Create, maintain, control, and retain documented information required by the standard and by the organisation. Implement document control: version management, approval authority, distribution control, access, protection, and disposition. Retain records as evidence of conformance for defined retention periods. Distinguish between documents (instructions, policies) and records (evidence of activities).

☐ Conforms ☐ Partly ☐ Gap ☐ Not applicable

Evidence / notes: _____

8.1 Operation — Operational planning & control (incl. management of change)

Plan, implement, control, and maintain processes to eliminate hazards and reduce OH&S risks to acceptable levels. Establish and maintain documented operational procedures for safety-critical activities. Implement management of change (MoC) process for changes to plant, equipment, people, processes, materials, or working hours that may affect OH&S. Control outsourced functions. Coordinate with contractors — obtain and communicate relevant OH&S information before work begins. Implement the hierarchy of controls in all operational decisions.

☐ Conforms ☐ Partly ☐ Gap ☐ Not applicable

Evidence / notes: _____

8.2 Operation — Emergency preparedness & response

Establish processes to prepare for and respond to potential emergency situations: fire, chemical spill, explosion, medical emergency, severe weather, security incident, utility failure, environmental release. Document emergency plans and procedures. Provide appropriate emergency response equipment. Conduct drills and exercises at planned intervals (at minimum annually for major emergencies). Review and revise plans after drills, incidents, or changes. Communicate emergency procedures to all workers and relevant interested parties. Retain drill records and post-drill improvement actions.

☐ Conforms ☐ Partly ☐ Gap ☐ Not applicable

Evidence / notes: _____

9.1 Performance — Monitoring, measurement, analysis & evaluation

Monitor, measure, analyse, and evaluate OH&S performance. Define what to monitor (leading and lagging indicators), methods, frequency, and who is responsible. Calibrate or verify monitoring equipment. Evaluate compliance with legal requirements and other OH&S obligations at planned intervals. Report performance data to management. Track trend data for: incident frequency rates, near-miss rates, sick absence rates, inspection completion rates, training compliance rates, and corrective action closure rates.

☐ Conforms ☐ Partly ☐ Gap ☐ Not applicable

Evidence / notes: _____

9.1.2 Performance — Evaluation of compliance

Establish, implement, and maintain processes to evaluate compliance with legal requirements and other OH&S obligations. Determine the frequency and methods for compliance evaluations. Evaluate compliance and take action when needed. Maintain documented results of compliance evaluations. Retain evidence that specific legal requirements (e.g. RIDDOR reports, permit-to-work records, pressure system inspection certificates, COSHH assessments) are being met.

☐ Conforms ☐ Partly ☐ Gap ☐ Not applicable

Evidence / notes: _____

9.2 Performance — Internal audit

Conduct planned internal OHSMS audits. Establish and maintain an audit programme covering: audit intervals (at minimum annually), methods, responsibilities, and reporting. Ensure auditor independence and competence. Audit criteria: ISO 45001 requirements + organisation's own OHSMS requirements. Address findings without undue delay. Retain audit programme and audit reports as documented information. Consider including unannounced behavioural safety observations in the audit programme.

☐ Conforms ☐ Partly ☐ Gap ☐ Not applicable

Evidence / notes: _____

9.3 Performance — Management review

Top management reviews the OHSMS at planned intervals (at minimum annually). Review inputs: status of previous actions, changes to context/interested parties/legal requirements, OH&S performance data (incidents, near misses, audits, objectives, compliance evaluations), worker participation and consultation feedback, risk assessment results, and improvement opportunities. Outputs: decisions on improvement opportunities, OHSMS changes, and resource needs. Retain management review records as documented information.

☐ Conforms ☐ Partly ☐ Gap ☐ Not applicable

Evidence / notes: _____

10.1 Improvement — Incident investigation, nonconformity & corrective action

Establish processes to report, investigate, and take action on incidents and nonconformities. For incidents: determine root causes using structured methodology (e.g. fishbone, 5-Why, bow-tie). Implement corrective actions to prevent recurrence. Review effectiveness of corrective actions. Report incident investigation results to relevant workers and management. Where incidents reveal the risk assessment is inadequate, update it. Retain documented evidence of incidents, investigations, actions, and effectiveness reviews. Conduct trend analysis on incident/near-miss data.

☐ Conforms ☐ Partly ☐ Gap ☐ Not applicable

Evidence / notes: _____

10.2 Improvement — Nonconformity & corrective action

When a nonconformity occurs: react, contain, and correct it; evaluate the root cause using a structured methodology; implement corrective action; review effectiveness; update risk assessment if needed; make system changes if required. Retain documented information: nature of nonconformity, actions taken, and results of corrective actions. Track corrective actions through to verified closure.

☐ Conforms ☐ Partly ☐ Gap ☐ Not applicable

Evidence / notes: _____

10.3 Improvement — Continual improvement

Continually improve the suitability, adequacy, and effectiveness of the OHSMS to enhance OH&S performance and promote a positive safety culture. Use performance data, audits, incident investigations, worker consultation, management review, and benchmarking to identify improvement opportunities. Maintain an improvement register. Demonstrate year-on-year measurable improvement in OH&S performance indicators. Engage workers in improvement initiatives.

☐ Conforms ☐ Partly ☐ Gap ☐ Not applicable

Evidence / notes: _____