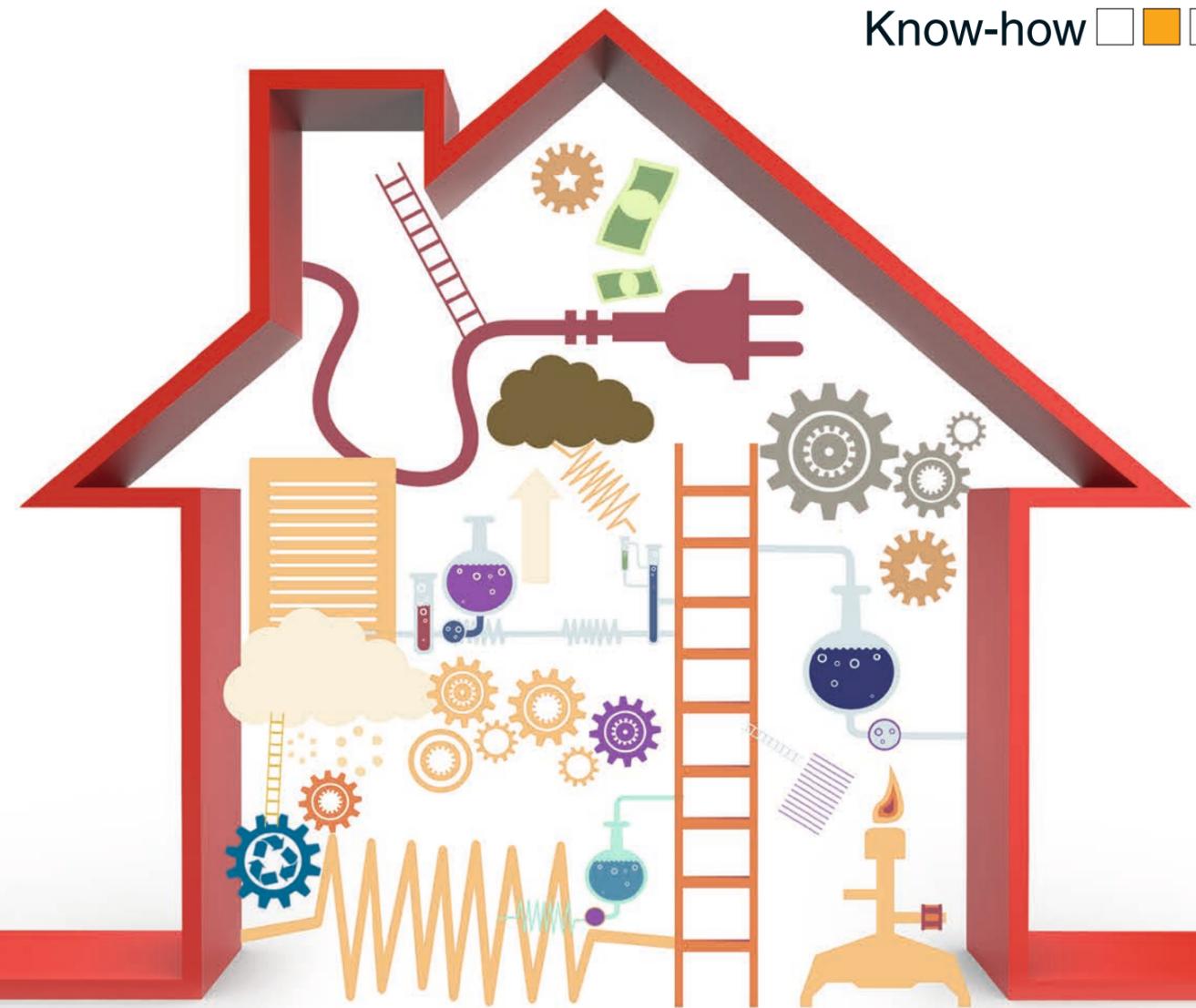# Under one roof

What are the merits (and potential drawbacks) of integrating safety systems with other management frameworks? Lucie Ponting *finds out*

IF your organisation is certified to the OHSAS 18001 safety standard and any other audited management standard, the idea of an integrated management system (IMS) might appeal.

Though most firms still operate stand-alone systems, the case for integration is based on the fact that all management systems share common elements, whether it is ISO 9001 for quality, ISO 14001 for environment, OHSAS 18001, ISO/IEC 27001 for information security, or the newer standards for business continuity (ISO 22301) and road traffic safety (ISO 39001 — see page 36).

"There is real benefit in integration," says Nigel Leehane, managing director of consultancy CRA Europe. "Not only does it produce cost efficiencies, but an IMS is far more likely to be integrated into mainstream business activities. This is the key to success, rather than having bolt-on systems that are used sporadically, focusing only on high risk activities.

"With any system, whether for safety or environment or another discipline, the fundamental objective is to change people's behaviour, and an effectively integrated system sends the message: 'this is the way we do business, the way we operate efficiently, safely and sustainably'."

Lowellyne James, a lecturer in quality management at Robert Gordon University and chair of the Chartered Quality Institute (CQI) for the north of Scotland, says an IMS should "reduce risks to the business, to customers and to wider society by allowing a full appreciation of the impact of the business's operations, both externally and internally."

He uses the BP Macondo well incident, which led to the Deepwater Horizon disaster, as an example of how quality, environment, and health and safety interact.

Many of the faults that contributed to the disaster: the absence of incoming inspection and testing, inadequate change management processes, incorrect parts, the breach of established well design, and poor supplier handling — were quality management issues, but they had enormous safety and environmental consequences.

Joined up

Suzanne Fribbins, risk product manager at British Standards Institution (BSI), says the strongest drivers of integration are to make processes more cost efficient and effective by reducing duplication and minimising paperwork and bureaucracy. (That they encourage too much of a paper chase is the criticism most commonly levelled at certified management standards.)

"Instead of having different audits, management reviews and documentation, you have one set of audits, and one management review and documented system," says Fribbins, "as well as a single approach to raising awareness, managing risk, and ensuring you're continually improving."

To enhance compatibility, the International Standards Organisation (ISO) has recently developed a common 10 clause, high-level structure applicable to all management systems standards.

"This will reduce the current need for extensive mapping studies looking at where the similarities and crossovers are," says Fribbins, "so that leadership will always be covered at clause five, planning at clause six, and so on."

From now on, when ISO or national bodies are revising or introducing new management system standards, they will have to fit this common structure.

According to the Institution of Occupational Safety and Health (IOSH), which has produced guidance for health and safety practitioners on integration (see box on page 26), a well-planned IMS should have the cost benefits and time savings noted above. It should also:

- allow decision making that best addresses the overall needs of the organisation
- reduce the risk that resolving problems in one discipline will create new ones in another
- offer the prospect of more rewarding career opportunities for specialists in each discipline — though additional training will be required for those with new responsibilities
- help ensure, through IMS reviews, that each element of the system develops

at the same rate, whereas independent systems could develop at different rates

make it easier to bring together expertise in each discipline to address problems, which helps to promote the exchange of initiatives such as supply chain surveys, and techniques such as risk assessment

minimise distortions in resource allocation, which might come about, for instance, because quality assurance feedback is usually rapid and statistically reliable, whereas evidence of the success of a safety initiative could take years.

For Stralfors, which provides print, mail, archiving and data management services and is part of Swedish-based PostNord AB group, the main drivers for integration were cutting costs and administration time. But the approach was also designed to increase time spent on reducing major risks.

Rob Norwell, the company's UK compliance manager, says that minimising background administration, its IMS — which encompasses five standards: ISO 9001, ISO 14001, OHSAS 18001, ISO 22301 and ISO/IEC 27001 — has allowed the firm to focus on significant "real life" issues.

"The senior management team is very busy," he says. "By integrating, we were also able to package up things in a more digestible format that helped them to buy in and become more involved."

Discrete packages

There is more than one template for integration. Some organisations accommodate all their systems under one generic management system. Others, particularly big and complex businesses, may choose to run two or more systems, each integrating multiple standards.

"It's perfectly acceptable to run quality, health and safety and environment in an integrated way," explains Fribbins, "but then to look after information security, business continuity and supply chain security elsewhere, for instance.

"Some find it easier that way," she adds. "The economies of scale are available but

Happier apart?

As well as putting the case for integration, in its publication Joined-up Working (www.iosh.co.uk/books_and_resources/guidance_and_tools.aspx), the Institution of Occupational Safety and Health (IOSH) suggests reasons why organisations keep systems independent:

- existing systems may already work well and integration could threaten their structure and consistency
- relevant specialists can continue to concentrate solely on their core areas of expertise
- an IMS can become over centralised and complex, and fail to account for local needs
- employers and employees already sceptical of excessive bureaucracy may fear integration could make things worse
- during the implementation of an IMS, the organisation may be vulnerable — existing procedures may lapse while staff focus on new approaches
- system requirements may vary across the topics — an organisation might need a simple quality system, but a more complex health and safety or environmental management system and vice versa
- there may be distortions in the structure of the IMS components because ISO environment and quality management standards are internationally recognised, while OHSAS 18001 is not, or because health and safety and environmental management are underpinned by law, yet quality management system requirements are largely determined by customer needs
- regulators and single-topic auditors may find it difficult to evaluate their part of the IMS when it is integrated with topics outside their competence.

IOSH argues, however, that a well thought-out and well implemented IMS can overcome most of these issues.

it might be too much to integrate say seven or eight systems. Also, some systems fit naturally together."

BSI finds the most common grouping is ISO 9001 and 14001 with BS OHSAS 18001. Integration of ISO/IEC 27001 (information security) and ISO 22301 (business continuity) is another obvious combination.

"It also varies sector to sector," adds Nigel Leehane. "…In a service industry, for example, quality is key, so a system certified to ISO 9001 may be the starting point, with the organisation subsequently integrating an environmental system into it."

Other organisations, in higher risk sectors such as manufacturing or oil and gas, will have a much stronger focus on safety, so might start with 18001 and add another system on the environment, for example.

Some organisations integrate their whole systems seamlessly, with a common IMS policy, a single set of objectives and all documentation covering both. Alternatively, you can just integrate certain parts. "In our case," notes Leehane, "we had separate policies within our integrated environment, health and safety (EHS) system.

"At that stage, we wanted to be able to emphasise to clients our commitments to both, to meet their expectations, but still use the same system to manage performance."

The firm has recently decided to replace them with an integrated EHS policy, which Leehane says will demonstrate equal commitment to both environmental and health and safety management and emphasise how they are central to its business.

For Stralfors, integration was a logical step, Norwell believes. The firm had operated to ISO 9001 standards since 1992 and 14001 since 2000 and then, in 2007, it brought in information security and later 18001, just as it also acquired a new business. "We realised we were doing individual

management reviews and audits based on each of these systems, so when we added 18001 and had to bring in the new firm, we looked at integration," he says.

First things

If you decide integration is a possibility for your organisation, your first steps towards an IMS should include:

- reviewing the business case, as well as your existing arrangements and the likely needs of each management system
- identifying the key competences for those designing the integrated system, and those implementing and operating it
- choosing the extent of integration and whether you plan to phase changes in
- consulting employees at all levels and securing senior management commitment and resources
- looking at guidance, such as PAS 99, a publicly available specification from BSI on integrating common management system requirements into one framework
- considering specific training on IMSs and whether you need external advice
- setting the criteria for monitoring and reviewing the effectiveness of the IMS.

In subsequent planning you will need to try to ensure the system doesn't fall into any of the traps IOSH identifies in the box above.

Stralfors managed the process in-house initially. But in the "final mile", explains Norwell, it used an external consultant to carry out impartial assessments and help put the documentation together.

"We got to a certain point, but then needed a bit of help. And since then, we have rolled forward on our own," he says.

He did not use PAS 99. "We reviewed it and looked at it," says Norwell, "but we found for us, it added additional areas of work without delivering additional value. "We

integrated our system using essentially a commonsense approach because we didn't want something that was over engineered; it had to be something we knew we would use and maintain."

Defensive stance

"Probably the biggest challenge to integration is where people are used to operating in silo environments and take the attitude: 'I look after that and that's how we do it'," says Fribbins. As with any change management project, securing allies to push it forward is essential.

"Don't underestimate the importance of having the right people around the table," she emphasises. "You can't do it alone; you need your subject matter experts, and you need buy-in that it is in everyone's best interests to operate more efficiently and effectively.

"Also, make sure people don't feel threatened and that they understand the reasons [for integration], so no one is obstructing or derailing the process."

Leehane also acknowledges that bringing together two or more very well established functions could be a problem. But bringing functions closer together also helps them exchange good practice, he says, and improves employees' understanding of the overall risks faced by the business.

Stralfors' facilities manager, Paul Tuckfield, who is responsible for health and safety at the firm, admits he had some initial doubts: "Though I saw there were huge practical benefits from a combined approach, for the purist there is a danger of weakening the health and safety message, which was something we had to discuss."

His main worry was the introduction of an integrated policy without a separate health and safety policy. "With all the other information in the policy, it could dilute the health and safety details and the overall message," he says.

"What we stressed is that all management systems are about controlling risks," Norwell adds. "To allay concerns, we made sure everyone was clear about where our highest areas of health and safety risk were, and the controls in place; we highlighted this within the integrated system and developed a methodology for reviewing, refreshing and amending our health and safety manual."

The firm involved its safety committees, and brought in safety-specific training for all staff in functional management positions.

"Ultimately, it's a trade-off," says Tuckfield. "In practical terms, it's fundamentally easier to manage a combined approach than lots of individual ones, and for our business, with its degree of [health and safety] risk, the balance works."

Audit time

Potential efficiencies from integration continue in the internal audit and external certification stages, though organisations

still have to pay to certify to the separate standards — there is no international IMS standard; you can decide to certify to the PAS 99 specification but each of the systems will need separate certification.

"We would come in and do the assessment in the usual way," explains Fribbins. "But if the system is integrated, it makes auditors' or assessors' lives much easier; instead of looking at four different document management systems, there's only

"For the purist there is a danger of weakening the health and safety message, which was something we had to discuss"

one and we can say 'Yes, that's working; it's managing document requirements across all those standards'."

BSI estimates that firms can save up to 20% on the combined assessment days for certification if they are operating a truly integrated IMS. The certification body is also training more auditors to cover multiple disciplines, which minimises the number of people coming into the business, though arguably they may not bring the same expertise to the new disciplines as they do to their primary ones.

Norwell's best advice to any organisation thinking of integrating is to "make sure that everything you're doing adds value. At times, we got a bit too tied up in the standards and in trying to do an all-encompassing approach, instead of saying: 'What is really applicable to our business, what do we really need to focus on, where are the dangers and the risks, and what do we really need to do to address them?'"

In practice, he believes the efficiencies from integration have given Stralfors "more time to deal with significant risks, which is what it's all about — there are only so many hours in a week." Integration has also helped in negotiating with customers or potential customers.

"We can sit down and have a knowledgeable conversation about a whole range of risks, and show how we've put together a streamlined system covering the whole business."

Tuckfield adds that integration has also made processes easier to maintain. "In my experience, delivery of change is usually strong but maintenance can be a problem. The less administration there is, the more likely you are to get people involved."

The question of whether there will ever be an IMS standard remains open. Lowellyne James believes the cost of separate certification may eventually produce enough pressure from businesses, while Leehane doubts this is something ISO, in particular, plans to address soon, though its new common high-level structure should encourage more integration.

To raise awareness of the benefits of IMSs more broadly, James would like to see greater cooperation between bodies such as IOSH, IIRSM, IEMA (the Institute of Environmental Management and Assessment) and the Chartered Quality institute.

But he sounds a note of caution, warning that focusing too much on rationalising existing management systems purely for the sake of cost could be self-defeating. Acknowledging that cost reduction is probably the main driver for change, he emphasises that it should not become the overriding factor, at the expense of effectiveness, efficiency and improving the performance of people and systems.