

# **Examiners' Report**

## **Unit 1 exam conducted on 23<sup>rd</sup> Apr 21**

### **Introduction**

For International Diploma in Safety Engineering (IDSE), the assessments are carefully designed to gauge the skill and knowledge of the learners as per the syllabus requirements. We believe that assessments should also provide an opportunity for learning by presenting the scenarios which require learners to assume the scenario specific roles and provide a practical, feasible and realistic solutions to the workplace health and safety problems/issues.

The examiner report has been developed for the learners who either passed or failed the specific unit, in order for them to re-evaluate their submitted work. This will be a value addition in the process of learning for all the learners. Similarly, this report will help the prospective learners to understand the structure and requirement of IDSE assessments and they can decide if this qualification is right for them or not.

### **Remarks by the examiners for overall Unit 1 Assessment**

Most of the learners who appeared in Unit 1 exam did the following mistakes

- 1- A structured response using a process approach was missing. Haphazard information was provided.
- 2- Generic details were provided by the learners with no or little reference to the specific scenario under consideration
- 3- Logical arguments were missing e.g. most of the learners mentioned Benchmarking is costly but hardly anyone has given the relevant reasons to support this claim. This is just one example.
- 4- Lack of understanding the "Specific Question Requirements" which resulted in lot of unnecessary addition of information which had no relevance with the intended response.
- 5- Copying from internet sources which were mostly out of the context in given scenario.

The following instructions were given to the learners as part of their specific Unit assessment;

"Support your answers with **logical arguments** and **examples** relevant to the given scenario. Generic and Bookish answers will not be accepted by the examiners. The examples of generic answers include, but not limited to, incompetent person, management commitment, lack of maintenance, negative safety culture, regulatory requirements etc."

**The marks are awarded as per the following criteria;**

- *Response is relevant to question's requirements and the scenario?*
- *Response is practical, feasible and effective in the given scenario conditions?*
- *Response is complete and covers all aspects of question's requirements?*

- *Response has logical progression using a process approach (No haphazard inclusion of information)?*
- *Response is clear, concrete and concise?*
- *Response does not include conflicting ideas?*

## **Section A**

**Carefully analyze the following scenario and answer to the 5 questions in context with given scenario only. Any generic or irrelevant response will not be accepted by the examiner**

### **Workplace Situation/ Scenario**

“STKL Private Ltd” is a large courier company having network of offices in 35 cities and a head office in capital city. It handles roughly 450000 shipments each month. The company has 500 permanent employees (Directors, Area Managers, Front Desk staff, Delivery staff) while 250 part time delivery staff are also registered with the company whose services are used on as required basis. The company also subcontracts some of its functions including;

- Envelopes and boxes Printing Services
- IT services
- Cleaning services
- International Courier services
- Employees Hiring services
- Training services
- Delivery Services (As required)

The company operates in single shift of 12 hours (Mon-Sat) starting from 7 am to 7 pm . The company’s governance policy also allows “Over Time” and lucrative overtime per hour allowance is given to all workers who carry out the job beyond stipulated 40 hours weekly. However, due to the governance system, over time is compulsory and not a choice however no staff has ever complained about over time. The company doesn’t currently have an OHS management system implemented but health and safety related occurrences are recorded to meet bare minimum legal requirements. The occurrence records show that there have been issues related to violence with the front desk and delivery staff as well as occasional traffic accidents and traffic rules violations during the delivery of shipments. Recently, a customer was also injured when the glass door of the branch office shattered and the news was widely circulated on social media resulting a disrepute for the company.

The management has shown concern over the issue and plan to implement a health and safety management system using ISO 45001:2018 as the criteria. You have been hired as safety advisor by the company to plan, develop and implement an OHS management system commensurate with the nature and scale of business. The management has allocated sufficient financial resources for the project

execution but wish to have minimum possible operational expenses for OHS management system. The project execution deadline is 45 days and the management has also facilitated for you to benchmark the OHS management system of a renowned International courier service company in order to expedite the whole process.

**All 5 questions carry 10 marks each (Total 50 Marks for Section A)**

**Please write scenario specific answers to the following questions;**

**Question 1-** Why do you think that the benchmarking another courier company's OHS management system may result in less effective OHS management system for your company? **10 Marks**

### **Examiners' Remarks**

#### **Mistakes by the learners which resulted in deduction of marks**

- Some learners outrightly rejected Benchmarking tool as a means of developing or implementing an OHS management system which is not right. This shows a lack of understanding about the benchmarking
- Some learners believed that a management system cannot be developed from the scratch using Benchmarking tool which is not correct. The structure of OHS management system can be benchmarked for company specific OHS management system development.
- Some learners mentioned the problem with the availability of the data from the international courier company although the scenario specifically mentioned that management has also facilitated for you to benchmark the OHS management system of a renowned International courier service company. It shows that learners did not focus on the scenario specific requirements and details.
- Most of the learners just focused on the "context of the organization" and wrote the differences between international courier company and the "SKTL Pvt Ltd." They were unable to justify how these differences will result in less effective OHS management system development. For example, International courier company is large company and "SKTL Pvt Ltd" is small company therefore benchmarking will be ineffective. They failed to provide the answer "Why or How?"
- Some of the learners diverted their focus from OHS management system to Quality Management system and emphasized the business case which were not the question requirements. If however, Business case to be included, it must be referenced with OHS management system for intended implications
- Many learners assumed certain things related to international courier company e.g. they don't have any subcontractors or they have skilled manpower etc. which were not part of the scenario. If such assumptions should be included, it must be specifically written that the company may or may not have the specific attributes.

#### **Summary**

The marks were deducted for lack of understanding about the benchmarking, inclusion of unnecessary and out of the context information, lack of rationale for the presented arguments and assumptions which were not part of the scenario.

### **What was intended response**

The intended response should have been focused as follows;

- Explaining Benchmarking with pros and cons in introductory paragraph relevant to the scenario
- Consideration as per scenario which otherwise may result in less effective or even ineffective OHS management system for SKTL Pvt Ltd;
  - o **Financial Resources**; Sufficient resources for OHS mgt system development provided but minimum operational expenses is management requirement so the targeted OHS management system of international courier company should be studied first if it will result in required bare minimum operational expenses or not.
  - o **OHS Mgt system Intended Outcomes**; Before we develop the OHS mgt system, we keep in mind what purpose it will serve or what results we will be going to achieve. Therefore, international courier company's OHS mgt system intended outcomes must be kept in mind and accordingly compared if we want similar results.
  - o **Efficiency and effectiveness**; What is the efficiency and effectiveness of international courier company's OHS management system. Are we already going to benchmark an inefficient and ineffective OHS management system? If yes then we cannot expect an effective OHS management system for our company as a result of benchmarking
  - o **Organizational Context**; The response to following in terms of (Why or How?) must have been included;
    - Company Size, location, OHS culture, job security, competency, OHS challenges, external issues, technological options (e.g. paperless mgt system etc.), market competition etc.

*(Most of the learners only focused on the organizational context)*

**Question 2-** What external issues will you consider, while planning OHS management system, which may influence OHS performance of the company? **10 Marks**

### **Examiners' Remarks**

#### **Mistakes by the learners which resulted in deduction of marks**

- Some learners used "PESTLE Tool" i.e. Political, Economy, Social, Technological, Legal and Environment which is a generic tool to identify the external issues but most of them failed to

establish a relationship how these factors are specifically significant for the SKTL Pvt Ltd. Mostly generic terms were used which does not serve the purpose for an Open Book Exam at this level where specific situation analysis and evaluation is a requirement. In practical situations while developing an OHS management system, you focus on company specific issues derived from the PESTLE tool.

### **Summary**

The marks were deducted for lack of understanding about the specific external issues and how they may influence the OHS management system's performance. Similarly, the marks were deducted for lack of understanding about the difference between internal and external issues.

### **What was intended response**

The PESTLE tool may have been used for identifying company specific external issues referencing them with OHS management system's performance. The examples of an ineffective and an effective response are given below;

#### *Generic Response*

- The availability of technological options may influence the OHS performance of SKTL Pvt Ltd.

The response does not explain how lack of technology can influence OHS performance of the organization?

*A correct response should be like;*

- The lack of availability of technological options may influence OHS management system performance of the organization; for example if online vehicle tracking option is not available, the courier staff may do over speeding (without being noticed by the company itself) in order to meet the delivery targets but they may put themselves into risk of accidents.

#### **Another Example**

- The Social factors may influence the OHS performance of SKTL Pvt Ltd.

The response does not explain what type of social factors and/or how they influence OHS performance of the organization?

*A correct response should be like;*

- The social factor for example how people behave with the front desk/delivery staff. Some cities/ specific areas within cities may be high risk area for public dealing keeping in view the threat of violence or aggression.

**Note:** Above responses have been provided as an example only for understanding and is not a complete response to the question

**Question 3-** How do you plan to develop OHS specific competence and culture within the whole organization? What major hurdles do you foresee during this process? **10 Marks**

### **Examiners' Remarks**

#### **Mistakes by the learners which resulted in deduction of marks**

- Some learners used a generic approach starting from management commitment, development of policies and procedures, setting OHS objectives, assigning roles and responsibilities etc. In other words, they included everything that is required to establish an OHS management system while lacking focus on the scenario conditions where the specific training and competence was needed to prepare the workforce for challenges like Defensive driving, Workplace violence etc.
- The question requirement was to develop a plan for given condition. Majority of the learners failed to develop any plan (Time frame, resources implications, intended outcomes, methodology etc.)

#### **Summary**

The marks were deducted for lack of a focused approach in developing a scenario specific plan.

#### **What was intended response**

The intended response should have been structured keeping in view the following,

- What are the Intended outcomes of the plan you are establishing and how will you measure if your plan is serving its intended purpose. What tools will you use to show the plan performance to the management.
- Does your plan include a gap analysis; where we stand and where we wish to reach?
- Does your plan include any foreseeable deviations? What is the rationale for the deviations and how will you manage the change in plan? Do you need a pilot project initially or going to launch a wide scale implementation?
- What need to be done in terms of educating the employees e.g. 8 man-hours (per staff) Defensive driving training to each delivery staff or 8 man-hours (per staff) general OHS training specific to the company hazards and foreseeable risks. A rationale for the training topic must have been included that why you selected a specific training as per the scenario conditions.
- What training methodology will be used e.g. hiring external trainers or doing it yourself, training medium e.g. class based or online etc.
- What need to be done in terms of creating awareness e.g. Display of posters at each office location or sharing the lessons learnt from previous incidents. When is the right time for this exercise and

how much cost implications it may have. What will be the posters like? What message are you going to communicate through awareness campaigns?

- How much time it will take to fully implement your plan? Proper scheduling was required.
- What will be the resources implication e.g. financial resources, employees engaged in training while being away from routine duties etc. (Practical approach was response requirement which must not create business disruptions)
- Does your plan includes part time staff?
- Does your plan include subcontractors' staff?

**Note:** The above is not the response to the question but the guidance for developing a plan to inculcate OHS specific competence and culture.

**Question 4-** What will be the proposed structure of an effective OHS management system for this company? Use process approach to explain your answer. **10 Marks**

### **Examiners' Remarks**

#### **Mistakes by the learners which resulted in deduction of marks**

- Some of learners used clauses of ISO 45001:2018 to present a structure of OHS management system while lacking company specific needs and requirements. The generic approach to answering the question resulted in deduction of marks.
- Some learners used PDCA model as the structure of OHS management system. PDCA is a tool which is used to improve the management system performance and is not a structure itself.
- A number of learners included unnecessary information copied from the internet which had no relevance with the scenario or question requirements

#### **Summary**

Mostly the learners focused on procedures and policies in very generic format without explaining how the system will work.

#### **What was intended response**

The intended response should have included;

- What specific procedures you'll establish using ISO 45001:2018 criteria e.g Risk assessment procedure, training procedure, inspections and audit procedure, incident management, and management review procedure etc.
- Develop an organizational chart with proper chain of command. Who is reporting whom for all key staff. What are their duties and responsibilities. Who will carry out risk assessment, who will carry out inspections and audits, when will be there any training interventions and who will provide the training, who will prepare the management review input data etc.
- Will you require external consultants in any of the OHS management system processes? Have you included them in your OHS management system structure?
- Have you assessed the contingencies for example, what if a key person is ill or left the job? Who will be there to assume his/her role as interim arrangement.
- How many safety officers you plan to propose to be hired in your structure?
- In simple words, who will do what and how will it be managed e.g. you can zone wise distribute the company for OHS management system and propose separate Safety department for each with a centralized performance monitoring (Just an example). Procedures do not function at their own unless there are roles and responsibilities defined against them for ensuring implementation, compliance and reviews.

**Note:** The above is not the response to the question but the guidance for developing an effective OHS management system structure for the scenario conditions.

**Question 5-** What factors will you consider in order to effectively utilize the financial resources for the proposed OHS management system development? **10 Marks**

### Examiners' Remarks

#### Mistakes by the learners which resulted in deduction of marks

- Majority of the learners' responses seems like they are answering the following question; How will you effectively utilize the financial resources? Which was not the question. The question specifically asked about the factors you'll consider in order to effectively utilize the resources which in turn will result in effective financial management. There seems a subtle difference but if we use the following example, then there looks huge difference;

How will you effectively manage financial resources?	Vs	What factors will you consider in order to effectively utilize resources?
How will you buy a car?	Vs	What factors will you consider before buying a car



## Summary

Mostly the learners focused on how to effectively manage financial resources rather than answering the consideration factors which will eventually result in effective utilization of resources.

## What was intended response

The consideration factors in the scenario under discussion may be;

- Scope of proposed OHS management system
- Intended outcomes of OHS management system
- Gap analysis (Where we stand and where we wish to reach in stipulated time) for infrastructure, competence, knowledge management etc.
- Risk profile of the courier company
- Context of the courier company (conditions under which the company operates) e.g. applicable legal requirements, availability of skilled manpower in the region etc.
- The structure of proposed OHS management system
- Proposed OHS management system development model e.g. Paper based, paperless system or a combination of both.
- Return on investment (ROI) with the proposed OHS management system.

Etc.

**Note:** the above mentioned factors (or any additional factors) must be supported by logical arguments in the exam scenario

## Section B

**Carefully analyze the following scenarios and answer to the question/s in context with given scenarios only. Any generic or irrelevant response will not be accepted by the examiner.**

### Workplace Situation/ Scenario

“XYZ Chemicals” is a medium sized company which deals in manufacturing of various chemicals and gases for industrial uses. The company employs 1500 personnel including the Directors, managers, supervisors and workers. The company has structured its governance system based on following functions;

- 1- Business Development

- 2- Budgets and accounts
- 3- Purchasing
- 4- Admin and HR
- 5- QHSE
- 6- Production
- 7- Storage and Delivery

The company has utilized extensive resources for deploying engineering and administrative controls to eliminate/minimize the risk of health to the workers due to exposure with chemicals. There have been no reported/identified cases of ill-health due to the exposure over a period of last 3 years. The company is quite satisfied with its health and safety performance. In a recent development, it was revealed that although there has been no ill-health issues, the company was not complying with a recently promulgated (6 months ago) regulatory requirement of chemicals labelling. The root cause was identified as the ineffectiveness of legal/regulatory requirements identification process. This alarmed the management who now wish to review the whole process of “Legal requirements and compliance procedure” to ensure it is effective.

You as safety manager has been tasked to carry out this task and present your findings and recommendations to the management.

**Question 6** - Write down in chronological order various processes within the “Legal requirements and Compliance Procedure” and give detailed explanation of each process about the inherent risks (what may go wrong) which may compromise the effectiveness of this procedure. **20 Marks**

### **Examiners’ Remarks**

#### **Mistakes by the learners which resulted in deduction of marks**

- Some learners focused on risk assessment of chemicals by emphasizing the need for traceability and control measures which was not the question requirement.
- Some learners included general safety guidelines for chemical storage and transportation etc. which was not the question’s requirement.

#### **Summary**

Mostly the learners lack how an OHS management system procedure is developed using a process approach.

#### **What was intended response**

The response should have the following elements;

A “legal requirements and compliance procedure” must have the following elements in order for it to be effective.

1- Identification of relevant legal requirements

- Who will identify the applicable legal requirements on an ongoing basis (Consultant or some person from the company designated for this job)
  - Risk- The designated person may be on leave or consultant is not competent to identify what is applicable to the specific type of organization. Similarly, the selection of designated person is inherently risky process.
- What frequency the procedure will identify for the identification exercises (e.g. weekly, monthly or yearly)
  - Risk- If frequency is set low e.g. weekly, it can inculcate complacency and the responsible person may feel it routine exercise and do it for record making purpose only instead of actually seeking if there is any new legislation/ regulatory requirement applicable or not. If frequency is set very high e.g. yearly then there may be new legislations/ regulatory requirement during the one year period while the organization may not have the cognizance of the same

2- Interpretation of applicable legal requirements

- Who will interpret the applicable legal requirements e.g. how a specific legal requirement is applicable on the organization and what the organization need to do in order to be legally compliant.
  - Risk- The wrong interpretation may lead the organization to be “over compliant” (Waste of resources) or “Under compliant”

3- Communication of applicable legal requirements

- Who will communicate to the respective functions within the organization about the applicable legal requirements along with what is expected from them to be fully compliant
  - Risk- Different functions may interpret the requirements differently if not communicated “What is expected from them”.

4- Resources estimation for legal requirements

- Who will estimate the resources requirements in order for being legally compliant.
  - Risk- If huge resource implications are resulting for being legally compliant, the organization may delay the implementation or may manage the phase wise implementation. Effective resource utilization is a key here

5- Implementation of legal requirements

- Who will supervise the implementation of procedures to comply with the applicable legal requirements.
  - Some functions/ employees may resist the change
- 6- Monitoring of ongoing compliance
  - How will the ongoing compliance be monitored (criteria, KPI's etc.)? Who will monitor and when will these be monitored (Frequency)
    - Risk- An ineffective inspection system may not identify the problems with the compliance or wrong sample selection for inspection may give misleading information
    - KPI's selected may not be relevant
- 7- Review of compliance
  - What will be the frequency of review for overall effectiveness of "Legal requirements and Compliance Procedure" and what criteria will be used to review the performance (e.g. benchmarking, regulatory audit outcomes etc.)
    - Risk- The lack of focus on the effectiveness of the procedure in its entirety. The organization may focus only on the compliance without having the cognizance that the procedure itself is ineffective or inefficient

**Note:** The risks mentioned are the examples only. The actual risks depends on various factors within each organization. The learners who mentioned risks as per their understanding were given maximum marks however, those learners who had no clue of "how a management system procedure is developed" were given zero or minimum marks.

### **Workplace Situation/ Scenario**

"RBMS Private Limited" is a large scale construction company which carries out various high rise building projects in the country. Company has 7 ongoing projects at different locations while health and safety department centrally manages the inspections, audits and investigations etc. The company has developed, implemented and maintained an OHS management system based on ISO 45001:2018 and various client specific criteria which are all integrated into company's OHS Management system. During the last one year, there have been 4 serious accidents of similar nature with a gap of 2-4 months at different project sites. The incident investigations for all these accidents were conducted by a team of safety department experts and professional consultants hired by the management.

During the annual management review meeting, the management has shown serious concern over recurrence of the incidents which directly and indirectly indicate the ineffectiveness of the incident investigations. You have been tasked to analyze the reasons why incident investigations have not served their intended purpose and present a report to the management.

**Question 7** – Why do you think there have been recurrence of the incidents of similar nature although the incident investigations were conducted by the experts?

**10 Marks**

### **Examiners' Remarks**

#### **Mistakes by the learners which resulted in deduction of marks**

- Some learners focused on lack of incident reporting which is irrelevant to the questions' requirements. The incident investigation has been carried out so there is no question of reporting them.
- Some learners included generic information e.g. poor safety culture, lack of management commitment etc. without providing any relevance how these could have resulted in ineffective investigation outcome
- Some learners mentioned relevant points e.g. lack of communication but could not justify it with arguments
- Some learners focused "Why accidents happen at workplaces" and included the unnecessary information not related to what is being asked.
- Some learners mentioned "Incompetent investigation team" although the scenario explains that investigations were conducted by a team of safety department experts and professional consultants hired by the management so there does not come any question of competency.
- Some learners even mentioned "Lack of management commitment" which is a conflicting remark to the given scenario which explicitly says that management is concerned.
- Some learners mentioned that witnesses may not cooperate with the investigation team. It can happen but expert investigation team do not rely on just witness statements. They have skills to elicit the factual information from the witness as well as other fact based data to form their judgement.

**Note:** Marks were deducted for unnecessary and irrelevant information even if the learners mentioned some relevant points as it explains the lack of focus to the specific situation/condition requirements.

#### **Summary**

Lack of focus to the question's requirements and inclusion of unnecessary information related to ineffective reporting method etc.

#### **What was intended response**

Keeping in view the given scenario conditions, following may be the likely reasons for the ineffective investigation outcomes;

Let's assume that investigation team was competent, then what could be the possible reasons that same or similar accidents happened again and again.

- The scope of the investigation did not include the recommendations i.e. the investigation team was just required to identify the root cause/s. In this way, the corrective actions were supposed to be taken by the functions who, due to lack of standard approach or lack of understanding, relied on less effective control measures which resulted in recurrence of accidents.
- The report was not communicated to all sites as "Lesson Learnt" so most of the sites had no clue what's happening on other sites. Corrective actions from one site must be used as preventive actions for remaining sites within the organization in order for the OHS management system to be effective in minimizing/eliminating the recurrences.
- Corrective actions needed in order to completely eliminate the root causes may have huge financial implications so the functional managers/ directors had opted out for less costly solutions; compromising the effectiveness.
- The identified root causes may be due to the external factors which were beyond the control of the organization e.g. using subcontracted equipment (Even if certified) , equipment design failures, daily wagers workforce etc. The organization's response to such external factors require a strategic change in business so it may have been impractical.
- The identified root causes may be attributed to poor OHS culture (Unsafe work practices) which cannot be improved in a limited time e.g. 6-12 months.
- Accident site manipulation or destroying the evidences subsequent to the accident may create difficulty for the investigators to make an informed decision.

**Question 8** - Write down your recommendations for ensuring effective incidents investigations which should not result the recurrence of incidents of similar nature? **10 Marks**

### **Examiners' Remarks**

#### **Stats**

#### **Mistakes by the learners which resulted in deduction of marks**

- Some learners focused on "what is an effective accident report" instead of how effective investigations should be carried out.
- Some learners mentioned relevant points but did not provide suitable arguments to support their view.
- Some learners did not follow a systematic approach and all points were haphazard i.e. not in a chronological order e.g. mentioned corrective actions before the evidence collection etc.

#### **Summary**

Lack of systematic and process approach to the response; highlighting and emphasizing insignificant points while missing or no explanation of significant points e.g. wrote a complete

paragraph on investigators' competence and no details for "Data Manipulation" i.e. how it can be eliminated etc..

### **What was intended response**

The intended response could be produced by using the response to Question # 7. The reasons which may have resulted in ineffective investigations outcome can be addressed to make the investigations effective.

### **Workplace Situation/ Scenario**

A large automotive manufacturing plant "Super GG Motors" has hired you as safety manager after their previous safety manager left the job. Next is a 3<sup>rd</sup> party certification audit after 3 months for the company against ISO 45001:2018 requirements. The managing director in a recent health and safety management review meeting has advised all functions to get prepared for the upcoming audit. The management wishes to have a successful audit and has given the notion that any non-conformities/ observations from the audit will not be tolerated. The workers, supervisors and managers are quite disturbed as the outcome of the audit directly effects their job retentions and promotions based on their OHS performance during the external audit.

You have read the minutes of the monthly safety meeting for the last 3 years' records and have observed that management sees non-conformities as the only indicator for the performance of OHS for various functions. Those who have zero non-conformities are appreciated while others who have some observations and non-conformities are reprimanded.

**Question 9 -** Why do you think that penalizing employees for having observations and non-conformities in their respective functions negatively influence the effectiveness of external audit outcome as well as the OHS performance of the organization?

**10 Marks**

### **Examiners' Remarks**

#### **Mistakes by the learners which resulted in deduction of marks**

- Mostly learners focused on "Employees demotivation" without suitable arguments how will it affect audit outcomes and OHS management system performance.
- Some learners included unnecessary information about "What is audit" and "the process of evidence collection"
- Some learners mentioned employees will be stressed and they will hide the information. However, the 3<sup>rd</sup> party auditors just don't rely on employees statements.

## Summary

Some learners could not present a clear understanding about the subject how penalizing employees effects OHS management system performance or a 3<sup>rd</sup> party audit outcome

## What was intended response

There were 2 aspects in the question

### 1- Audit Outcome

- The purpose of 3<sup>rd</sup> party audit is not policing. Organizations invite experience auditors “Come see our system and let us know how can we improve it by identifying the procedural or process ineffectiveness” as against the conventional thinking of Audits as policing. So if an organization is penalizing employees for the identified observations and non-conformities then what is the purpose of audit? Non-conformities and audit observations are required but recurrence of non-conformities show ineffective root-cause identification and/or ineffective corrective actions which reveal system weakness.
- 3<sup>rd</sup> party audits carry out a system review through process approach and they highlight procedural ineffectiveness which has nothing to do with employees. So, both way, it'll be the organization who will be wasting money in 3<sup>rd</sup> party audits as no value addition will be there if there are zero observations and zero non-conformities.

### 2- OHS performance

- The creativity and innovation cease to exist in an environment of fear and victimization. The OHS management system requires a positive OHS culture for it to improve. A negative safety culture will result leading to huge resources implications and the organization will achieve anything good and positive
- ISO 45001:2018 clause 5.4 “Consultation and Involvement of Workers” requires employees or their representative to be part of the system and provide their input for improvement. In an environment of victimization, there will be no input from the workers and it is great possibility that management may take decisions in isolation which may result in loss of resources due to the ineffectiveness or lack of ownership by those who carry out the processes.

**Note:** Above are just examples but basic idea is that without non-conformities and observations, there can be no improvement in OHS mgt system.

**Question 10 –** Why relying on “Number of Non-conformities” alone cannot give the real OHS performance of the organization?

**10 Marks**

## Examiners' Remarks



### **Mistakes by the learners which resulted in deduction of marks**

- Some learners' responses focused on "Effectiveness of Inspection and Audit process" and copied the same from the book. That was not the required response for this question. However, marks were given as some of the points were related (Not all).
- Some learners mentioned other means of gauging the OHS performance e.g. Active monitoring or preventive actions which is true but they failed to provide the arguments why relying on "Number of Non-conformities" may not give the real OHS performance of the organization. Their response was most suited to the question; Why relying on "Non-conformities" alone cannot give the real OHS performance of the organization?
- Some learners mentioned OHS management system performance indicators only

### **Summary**

The focus of learners was "What other means/tools to measure OHS performance of the organization apart from the non-conformities" rather than giving the arguments for the question's requirement.

### **What was intended response**

There were 2 aspects in the question;

- 1- Less or No non-conformities at all

We have discussed this scenario in response to Question# 9 that no non-conformities means no or minimum improvement in the process or system. Non-conformities provide a window of opportunity in terms of eliminating the root causes through effective corrective measures. The organizations who have better knowledge management (Lesson learnt from accidents) have better OHS performance.

- 2- Huge number of non-conformities

Here the question arises that if there are huge number of non-conformities in a given period, does it mean that organization's performance is poor? For that we have to look into the following;

- How many NC's are significant? Significant NC's are those which result in corrective actions leading to improvement in processes for efficiency and effectiveness enhancement.
- Has there been increased inspections? %age of NC's vs number of inspections is a better criteria
- Increased number of non-conformities are not a threat to the OHS management system performance but recurrence of same or similar non conformities are actual problem.

So relying on numbers in quantitative manners does not provide a real picture of OHS management system performance but require a qualitative analysis of the situation as well.

Note: The learners who mentioned other KPI's for OHS performance were awarded with 3-7 marks based on the response approach.

### **Workplace Situation/ Scenario**

“Supreme ST Oil Private limited” is a large oil storage facility which is providing storage services for various oil marketing companies. The company houses large storage tanks upto 100 K Gallons storage capacity whereas total storage capacity of the company is 10 million Gallons. The warehouse is scattered over a large area of 1000 K Square meters. Keeping in view the inherent risk of fire and explosion due to presence of flammable liquids, the company has established and implemented paper based “Permit to Work (PTW)” system for all maintenance work on the storage tanks.

The company frequently utilizes the services of 3<sup>rd</sup> party approved and listed contractors for performing maintenance activities which include Non-destructive Testing, welding and cleaning services for internal and external maintenance of the tanks. The specific area supervisors arrange the approval of PTW before the 3<sup>rd</sup> party workers initiate the work on the storage tanks. The process of approval from initiation takes quite a long time so the management is considering to establish a paperless IT based PTW system in order to expedite the efficiency of the process. The management foresees lesser downtimes for the tanks resulting availability of maximum storage capacity at any given time. However, they intend to assess if there can be any additional risks of health and safety with the new IT based PTW system and incorporate those risks when designing and developing the revamped PTW procedure. You as a safety manager have been tasked to carry out the feasibility study and present a report to the management.

**Question 11** – What arrangements the approving authority must ensure before signing the approval for paper PTW document? **10 Marks**

### **Examiners’ Remarks**

#### **Mistakes by the learners which resulted in deduction of marks**

- Overall response to this question was well written by most of the learners however, some missed significant points (Which are mentioned in intended response) so marks were deducted.
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#### **Summary**

The response structure was good however some missed significant points related to scenario under discussion and focused on technical details e.g. oxygen level which can be covered under risk assessment.

#### **What was intended response**

Following arrangements must have been ensured before signing the PTW document

- 1- Assessment of risks related to the work activities have been carried out effectively

- a. Any foreseeable risks from nearby/ external factors have been taken into account e.g. simultaneous work by the company workers at same site where 3<sup>rd</sup> party workers will be carrying out the task independently and a conflict may arise which could compromise the health and safety of workers from both sides.
- b. The control measures have been in place which are commensurate with the foreseeable risks. For example oxygen level, gas testing, PPE's, required skill level for the job, supervisory needs etc.
- 2- Identification of situations which may create emergency situations e.g. erroneous oil filling within tanks during maintenance, fire or workers' suffocation etc.
- 3- Emergency rescue arrangements are in place for all foreseeable emergency situations

**Question 12** – What should be the structure of proposed paperless PTW process from initiation till completion? What additional risks can be foreseen and how those risks will be managed? **10 Marks**

### **Examiners' Remarks**

#### **Mistakes by the learners which resulted in deduction of marks**

- Many learners repeated the same or similar content as in Q# 11.
- Some learners explained the process from initiation till completion but there was either no clue how paperless process will work or the defined process was very vague

#### **Summary**

The process approach was missing as mostly learners focused on the contents of the PTW form rather than the process of authorization.

#### **What was intended response**

The intended response could have been completed either by developing a PFD (Process flow diagram) or the explanation of the same.

- 1- Creating a PTW request
  - Drop down menu selections for various requirements e.g. Time and date, nature of job, worker details, PPE's, Emergency arrangements, isolation requirements (Already saved in database)
  - Once filled, option to "Submit" this form
- 2- Receiving PTW request by Competent Authority
  - A pop-up notice appears on the screen
  - Competent authority reviews the request
  - Competent authority ensures there is no conflict e.g. supervisor is not detailed on another task simultaneously, Or there is no task being carried out in closed proximity which may create any risks

- Competent authority ensures that required PPE's and emergency arrangements have been issued from store or positioned at the site through in-built software features
- 3- Competent Authority Approves the PTW
- Once satisfied, the competent authority approves the PTW for the specific duration as intended
- 4- Extension or Cancellation
- PTW form will be automatically cancelled when the stipulated time is over. A pop up notice appears on PTW requesting function which must be responded with Yes.
  - If requesting authority does not respond to the cancellation notice, competent authority may devise methods to contact the PTW requesting functions for further course of action e.g. cancellation/ extension.

**Note:** Any procedure can be designed for paperless PTW as per the organization's requirements and risk profile. The above is just an example.

### **Workplace Situation/ Scenario**

"ABC Aviation" is a contractor company which provides services of maintenance and overhauling of aircraft parts and manufacturing of metal parts for various client companies. The company has 1300 employees on its payroll. It has established, implemented and maintained the self-compliance against OHSAS 18001 since last 10 years and have now updated their system to meet the requirements of ISO 45001:2018. Company has established key performance indicators for Occupational safety and health and carries out inspections and internal audits to ensure that intended outcome of OHS management system are being achieved. However, the management relies on inspections and internal audits and subsequent corrective/preventive actions against the identified non-conformities and/or observations and do not carry out any management review process. The management believes that if issues are being addressed at functional levels in terms of corrective/preventive actions then there is no need for a thorough management system review. You have recently been hired by the company as safety advisor and had the opportunity to look into the previous inspections/audits and corrective/preventive actions record. You notice that although there has been no serious health and safety issues within the company but, the management system efficiency is very low as compared to the resources being utilized. You plan to advise the management for approval of the external 3<sup>rd</sup> party audit as well as a 6 monthly management review meeting

**Question 13 -** Why do you think external 3<sup>rd</sup> party audit will be value addition for the OHS performance as well as the efficiency of OHS management system of the company? **10 Marks**

### **Examiners' Remarks**

#### **Mistakes by the learners which resulted in deduction of marks**

- Many learners just only focused on external auditor's competence without explaining how the company will specifically benefit from the 3<sup>rd</sup> party audit. For example some learners wrote "3<sup>rd</sup> party auditors are competent" and did not explain how their competence may benefit the organization as outcome of the audit.
- Some learners doubted the competence of internal auditors which is not always correct. Some organizations have internal auditors with better competence than the external 3<sup>rd</sup> party auditors. It is very likely that an auditor who is working as internal auditor in one company may be doing external 3<sup>rd</sup> party audits for other organization through a certification body
- Some learners focused on the certification as 3<sup>rd</sup> party audit outcome which was not relevant to the question requirements as business benefits were not asked.

### Summary

How 3<sup>rd</sup> party will be a value addition so focus should have been on value addition through 3<sup>rd</sup> party auditing as a process.

### What was intended response

The intended response could be

- Due to the complacency or organizational inertia, it is very likely that some ineffective processes may be in use which needed a review from an external auditor who may have conducted audits in similar organizations and had the opportunity to observe best practices.
- 3<sup>rd</sup> party audits have lesser (Not zero) conflict of interest as compared to the internal audits so the outcomes of 3<sup>rd</sup> party audit will be value addition because they are more likely to highlight significant non-conformities and observations which internal auditor may miss due to a routine exercise.
- The organization employees' are more likely to be prepared for an external audit than an internal audit and they will look into the processes in more details which will ultimately create more awareness and improvement.
- Management will be more likely to allocate resources for corrective and preventive actions subsequent to a 3<sup>rd</sup> party audit which in turn will improve the OHS management system performance.
- External auditors are more likely to focus on the processes/ system effectiveness which in case of internal auditors may be limited to the compliance of existing procedures only.
- 3<sup>rd</sup> party auditors have more insight about legal requirements as they routinely audit organizations and their legal compliance. Their observations/ non-conformities will help the "ABC Aviation" to meet/exceed the legal requirements.
- Etc.

**Question 14** – What value addition a management system review will serve although the company has an effective inspection and internal audit process in place? **10 Marks**

## **Examiners' Remarks**

### **Mistakes by the learners which resulted in deduction of marks**

- Many learners focused on management review process i.e. how will it be conducted
- Many learners provided the details about the input data for a management review process
- Some learners mentioned it to be essential part of PDCA model or ISO 45001:2018 but did not justify why is it so.
- Learners did not differentiate how inspection and audit system alone, without the management review, can result in the system ineffectiveness.

### **Summary**

The focus should have been on the value addition which can be gained through management review

### **What was intended response**

The response should not only focus the value addition through management review but also include information why even an effective inspection and audit system followed by a corrective/preventive action procedure may not achieve the intended outcome of the management system if management review process is skipped.

It required a clear understanding and a practical approach to respond to the question by highlighting the significance of review process (ACT) in comparison with inspection and audit process (Check)

## **End of Examiner's Report**