HKCAS Supplementary Criteria No. 7

Accreditation Programme for Occupational Health and Safety Management System Certification

1 INTRODUCTION

1.1 HKAS accreditation for occupational health and safety management system certification is provided under Hong Kong Certification Body Accreditation Scheme (HKCAS) and is open for voluntary application from any certification body offering a third-party certification service on occupational health and safety management system to OHSAS 18001 for area(s) described in Appendix A or in respect of a certification scheme. The certification scheme shall satisfy the criteria set out in HKCAS SC-11.

1.2 The accreditation criteria for occupational health and safety management system certification include HKAS 002, HKCAS 003: 2015, HKCAS SC-04, the relevant HKAS and HKCAS Supplementary Criteria, the relevant IAF Mandatory Documents, and the current edition of this document which serves to amplify the accreditation requirements in the above standards.

1.3 The normative documents listed in Appendix B form part of the accreditation requirements of this document. For dated references, only the edition cited applies. For undated references, the latest editions (including any amendments) apply.

1.4 HKAS operates its accreditation process in accordance with Annex AA of HKCAS 003: 2015 and Appendix C of this document. Applicant or accredited certification bodies should take note of the process applicable to them.

1.5 Details of the HKCAS accreditation for an accredited certification body are given in its current scope of accreditation. For an accredited certification body offering certification service(s) in respect of certification scheme(s), the details include identification of the certification scheme(s), a brief description of each scheme such as certification criteria, normative references, evaluation and surveillance regime.

1.6 Fees for application, assessment and other accreditation services are charged in accordance with HKCAS 006.

1.7 Accreditation of a certification body for a particular management system certification is an attestation that the certification body is competent in offering a third-party certification service on that management system certification for which it is accredited in accordance with the accreditation criteria. An accredited certification body shall comply with the relevant accreditation criteria at all times for maintaining accreditation. Nevertheless, accreditation is not a guarantee that an accredited certification body will carry out its accredited activities in accordance with the relevant accreditation criteria all the time. Furthermore, accreditation is not a guarantee that any organisation certified by an accredited certification body is in conformity with all certification requirements. HKAS does not endorse, sanction or approve in any way, any organisation certified by any accredited certification body. Conversely, failure to obtain certification by an accredited certification body does not imply that HKAS has refused to endorse, sanction or approve in any way the applicant organisation to be certified.

2 TERMS AND DEFINITIONS

2.1 For the purposes of this document, the terms and definitions given in OHSAS 18001 apply for applicant and accredited certification bodies offering a certification service to OHSAS 18001.

2.2 The term “assessment” refers to the process in which HKAS Executive assesses the competence of a certification body while the term “audit” refers to the process in which a certification body evaluates the conformity of an organisation with certification criteria.

2.3 The term “shall” is used throughout this document to indicate those provisions which are mandatory. The term “should” is used to indicate guidance which, although not

mandatory, is provided by HKAS as a recognised means of meeting the requirements.

2.4 In this document, the term "lead auditor" is used. It has the same meaning as the term "audit team leader" which is used in HKCAS 003: 2015.

3. RESOURCE REQUIREMENTS

3.1 An applicant or accredited certification body shall have at least one competent auditor or audit team in every area (classified in accordance with Appendix A) for which it has applied or is holding current accreditation.

Lead auditor and auditor

3.2 A lead auditor and an auditor shall have:

(a) obtained a qualification in an engineering, technology or science discipline listed on the Qualifications Register (QR) as meeting the requirement of recognised level 4 or above of the Qualification Framework (QF), the Education Bureau, or

(b) obtained an associate degree or higher diploma in an engineering, technology or science discipline from a recognised education institute in Hong Kong, or equivalent qualification, and

(c) successfully completed relevant OH&S education programmes or training courses which individually or in combination cover at least the subjects of (i) occupational health and safety laws, codes of practice and standards, (ii) principles of hazard identification and risk management, and (iii) health and safety hazards prevention techniques.

3.3 An applicant or accredited certification body shall ensure that its lead auditors and auditors have successfully completed appropriate training on relevant OHSMS standards (e.g. OHSAS 18001) and audit technique based on ISO 19011.

3.4 A lead auditor and an auditor shall have at least three years OH&S work experience in management capability involving the exercise of judgement, problem solving and communication with people.

3.5 To be an OHSMS auditor, he / she shall complete at least four OHSMS audits with a total at least 20 days of audit time as an auditor-in-training under direction and guidance of a competent OHSMS auditor. To extend an auditor who is already found to be competent in performing audits for other types of management system certification to OHSMS certification, he / she shall complete at least three OHSMS audits with a total at least 15 days of audit time as an auditor-in-training under direction and guidance of a competent OHSMS auditor. For both situations, the audits should be completed within the last three consecutive years. The OHSMS used for demonstrating audit experience shall at least address the following OH&S elements:

(a) hazard identification, risk assessment and determining controls;
(b) occupational health and safety laws, codes of practice;
(c) emergency preparedness and response;
(d) incident investigation.

3.6 To be a lead auditor, he / she shall complete at least 15 days of audit as acting in the role of an audit team leader under the direction and guidance of a qualified lead auditor.

3.7 An applicant or accredited certification body shall have an effective system to ensure the continued competence of its lead auditors and auditors. The certification body shall also maintain up-to-date audit experience records for its lead auditors and auditors.

3.8 An applicant or accredited certification body shall have documented processes to evaluate competence of lead auditors and auditors in accordance with ISO/IEC 17021-1: 2015. A number of evaluations methods can be used as described in Annex B of ISO/IEC 17021-1: 2015. The evaluation process shall be comprehensive including both auditing technique and technical knowledge. At least the following aspects shall be included in the evaluation.

(a) knowledge of relevant OHSMS standards;
(b) knowledge of occupational health and safety principles and practices;
(c) knowledge of industry practices and process being audited;

(d) ability of auditing methods and techniques for auditing relevant OHSMS standards;
(e) the ability to assess the application of relevant OH&S laws and code of practice (Appendix D lists out major relevant OH&S legislation in Hong Kong);
(f) the ability to identify OH&S hazards and assess their risks;
(g) the ability to evaluate OH&S controls and their effectiveness;
(h) the ability to identify evidence of nonconformity in the organisation being audited.

3.9 An applicant or accredited certification body shall evaluate the performance of every lead auditor and auditor on-site at least once every three years. The evaluation shall cover all aspects of the activities that the auditors have been authorised by the certification body to perform. Corrective actions shall be taken if there is any doubt on their competence.

Technical expert

3.10 Technical experts may be included in the audit team. They provide technical support to the auditor or the team. Technical experts need not be trained on auditing techniques but must have sufficient knowledge on the activities to be audited. During the audit, technical experts shall work under the direction and close supervision of a qualified lead auditor or auditor.

Personnel for making certification decision

3.11 Certification decisions may be made by a staff member or a committee. In case the certification decision is made by a committee, an applicant or accredited certification body shall ensure that the committee members who make the decision on granting/withdrawing a certification shall have a level of knowledge and experience sufficient for making a sound decision based on the results or information obtained from the auditing processes. The certification body shall also have documented procedures and criteria for the committee to make certification decisions and the committee members are conversant with the procedures and criteria. It may be necessary to provide appropriate training to committee members. Detailed records of the factors considered by the committee and the deliberation shall be kept. Performance of the committee shall be monitored.

Training

3.12 An applicant or accredited certification body shall identify and evaluate training needs for its personnel and provide them the necessary training. After training, the competence of the personnel involved in OHSMS certification activities shall be evaluated.

Work instruction

3.13 An applicant or accredited certification body shall provide adequate and up-to-date documented work instructions including information about OH&S laws, regulations and code of practices to its lead auditors and auditors to ensure that all processes and activities have been performed according to the requirements of HKCAS 003: 2015 and the certification body.

4. INFORMATION REQUIREMENTS

4.1 An applicant or accredited certification body shall include all names and geographic locations of a certified organisation covered by a certification in a certification document. The activities carried out in each geographic location covered by the certification shall also be clearly specified in the certification documents.

5. PROCESS REQUIREMENTS

5.1 An applicant or accredited certification body shall specify the information to be provided by an applicant organisation which applies for its certification. Upon receiving an application, the certification body shall review and check whether sufficient information has been provided by the applicant and ask for supplementary information if necessary. To ensure that essential information will not be missed out, the certification body should design an application form which lists all the information required for use by applicants.

Certification audit

5.2 For the stage 1 audit, an applicant or accredited certification body shall include on-site visit at an applicant organisation's premises including both permanent location(s) and temporary site(s) where the applicant organisation carries out work or service unless there are justification for not doing so.

5.3 An applicant and accredited certification body shall determine the interval between stage 1 and stage 2 audits and shall only conduct stage 2 audit after the findings identified in the stage 1 audit have been adequately resolved by the applicant organisation. As in general, applicant organisations will need some time to adequately resolve findings identified in the stage 1 audit, scheduling the stage 1 and stage 2 audits back to back is not recommended. The interval between stage 1 and stage 2 audits and its justification shall be recorded. The certification body should repeat stage 1 audit if changes to an applicant organisation's OHSMS have rendered the information collected in the original stage 1 audit invalid.

5.4 Where parts of an applicant organisation's OHSMS have been confirmed to be in conformity with the certification criteria in the stage 1 audit, they need not be re-audited in the stage 2 audit. However, an applicant or accredited certification body shall in the stage 2 audit verify that no substantial changes have been made to those parts. For such cases, the stage 2 audit report shall state clearly that conformity of those parts has been established during the stage 1 audit.

5.5 During audits, focus should be placed on the effectiveness of an organisation in hazard identification, risk assessment, determining controls, incident investigation, emergency preparedness and response, implementing controls, monitoring and measuring OH&S performance, corrective actions and preventative actions. The competence of staff in performing, reviewing and approving such activities shall be rigorously evaluated. The system of the organisation for ensuring that such activities are performed, reviewed and approved properly shall also be examined carefully. During assessments, HKAS assessment teams will assess whether audit teams have the required expertise to carry out such competence evaluation and have devoted sufficient time to carry out the evaluation properly.

5.6 When the state of an organisation being audit is time dependent, an applicant or

accredited certification body shall select the date, time and season of the audit to ensure that the audit findings are representative. Where it is not possible to cover all possible states that the organisation may take during an audit, the certification body should through other means, e.g., inspection of records and procedures and discussion with relevant personnel, to ensure that the overall findings are representative. During subsequent surveillance and recertification audits, the certification body should endeavour to cover those states which have not been covered in previous audits.

5.7 To ensure consistent quality of certification audits, an applicant or accredited certification body shall have documented procedures, criteria and quality assurance measures for all certification schemes it operates. In particular, the applicant certification body shall implement a system to ensure that the certification activities are operating effectively and certification decisions are made by parties not involved in the audit.

Audit Time Determination (for OHSMS certification to OHSAS 18001)

5.8 An applicant or accredited certification body shall determine the required audit time for initial certification audits, surveillance and recertification audits in accordance with Appendix E of this document.

Relationship with Safety Audit / Review of the Factories and Industrial Undertakings (Safety Management) Regulation (for OHSMS certification to OHSAS 18001)

5.9 Relevant observations made during Factories and Industrial Undertakings (F&IU) safety audits / reviews may be reported in OHSAS 18001 certification provided that applicable accreditation criteria are met. An applicant or accredited certification body intending to make use of F&IU observations in an OHSAS 18001 audit shall ensure that its auditors are fully aware of the differences between the requirements of F&IU and OHSAS 18001 and will take extra precautions when applying such observations. The certification body shall also implement a system to check by an independent party that such observations have been correctly applied. The certification body should implement a mechanism to ensure that the two sets of requirements are not confused.

Note 1: The F&IU (Safety Management) Regulations have its own set of requirements as to how F&IU safety audits and reviews should be conducted. Certification bodies making use of F&IU safety audit and review observations in OHSAS 18001 certification process are reminded to comply with such requirements. OHSAS 18001 standard is not designed to comply with the F&IU (Safety Management) Regulation, thus submission of such audit to fullfil the F&IU (Safety Management) Regulation is not acceptable to the Labour Department.

Scope of certification

5.10 An applicant or accredited certification body shall communicate with its applicant organisation to define the scope of certification. The scope of certification shall refer to defined geographic locations and defined boundaries of certified activities. The certification body shall define the scope of certifications at least based on the following elements :

(a) significant elements of the applicant organisation affecting occupational health and safety;

(b) interfaces / interaction between different activities of the application organisation, for example, activities occurring on the same location; and

(c) OH&S laws and regulatory requirements governing the activities of the application organisation.

Audit report

5.11 The audit team of an applicant or accredited certification body carrying out an audit shall prepare a self-contained audit report in accordance with ISO/IEC 17021-1: 2015 requirements.

Note: The OHSAS 18001 audit report may include relevant observations made during F&IU safety audits / reviews. However, the F&IU safety audit or safety review report(s) shall not form part of OHSAS 18001 audit report. The OHSAS 18001 audit report shall explicitly state those relevant observations and shall not make reference to the F&IU safety audit or safety review report(s).

Appendix A

(normative)

SCOPE OF ACCREDITATION

Accreditation will be granted area by area. The areas are as defined by the statistical nomenclature for economic activities (NACE Rev. 1) 1994 published by the Commission of European Communities (Official Journal L 083 1993) summarised in the table below.

Area No	Description	NACE Code
1	Agriculture, fishing	A, B
2	Mining and quarrying	C
3	Food products, beverages and tobacco	DA
4	Textiles and textile products	DB
5	Leather and leather products	DC
6	Wood and wood products	DD
7	Pulp, paper and paper products	DE 21
8	Publishing companies	DE 22.1
9	Printing companies	DE 22.2, 3
10	Manufacture of coke and refined petroleum products	DF 23.1, 2
11	Nuclear fuel	DF 23.3
12	Chemicals, chemical products and fibres	DG minus 24.4
13	Pharmaceuticals	DG 24.4
14	Rubber and plastic products	DH
15	Non-metallic mineral products	DI minus 26.5, 6
16	Concrete, cement, lime, plaster etc	DI 26.5, 6
17	Basic metals and fabricated metal products	DJ
18	Machinery and equipment	DK
19	Electrical and optical equipment	DL
20	Shipbuilding	DM 35.1
21	Aerospace	DM 35.3
22	Other transport equipment	DM 34, 35.2, 4, 5
23	Manufacturing not elsewhere classified	DN 36
24	Recycling	DN 37
25	Electricity supply	E 40.1
26	Gas supply	E 40.2
27	Water supply	E 41, 40.3
28	Construction	F
29	Wholesale and retail trade; Repair of motor vehicles, motorcycles and personal and household goods	G
30	Hotels and restaurants	H
31	Transport, storage and communication	I
32	Financial intermediation; real estate; renting	J, K 70, K 71
33	Information technology	K 72
34	Engineering services	K 73, 74.2
35	Other services	K 74 minus K 74.2
36	Public administration	L
37	Education	M
38	Health and social work	N
39	Other social services	O

Appendix B

(normative)

NORMATIVE REFERENCES

B.1 HKAS 002, Regulations for HKAS accreditation

B.2 HKAS SC-01, Use of HKAS accreditation symbols and claims of accreditation status

B.3 HKAS SC-02, Non-conformities and their grading

B.4 HKAS SC-04, Intervals between reassessments and surveillance visits

B.5 HKAS SC-06, Code of Conduct

B.6 HKCAS 003: 2015, Technical Criteria for Accreditation of Management System Certification bodies

B.7 HKCAS SC-04, Accreditation regulations specific for HKCAS – certification body

B.8 HKCAS SC-11, HKAS policy on product and management system certification schemes

B.9 ISO 19011: 2011, Guidelines for auditing management systems

Appendix C
(normative)
HKAS ASSESSMENT PROCESS

C.1 HKAS operates its accreditation process in accordance with Annex AA of HKCAS 003: 2015 and this appendix. Emphasis of HKAS assessment will be given to whether the certification body has the necessary expertise in the occupational health and safety management system such as relevant occupational health and safety laws, regulations and code of practice, hazard identification and risk assessment, occupational health and safety hazard prevention technique, processes and relevant technologies, and the robustness and reliability of its auditing process.

C.2 HKAS Executive will conduct a preliminary visit for an applicant certification body which has not been accredited previously under HKCAS. If the applicant certification body has already been accredited for another certification field under HKCAS, e.g., QMS, EMS or product certification, the application for accreditation of OHSMS certification will be treated as an application for extension of accreditation and no preliminary visit will be conducted. Nevertheless, as OHSMS certification is to be carried out in accordance with ISO/IEC 17021-1: 2015 and if the certification body has not been accredited for certifications carried out in accordance with this standard, e.g., if the certification body is accredited only for product certification, the certification body is strongly recommended to request HKAS Executive to conduct a preliminary visit at an additional fee.

C.3 The assessment team will visit the office of the applicant certification body, arrange on-site witnessing for its audit activities and where necessary, interview with auditors. Other appropriate assessment methods may also be used to ensure the competence of applicant certification in operating the certification system to be accredited at the discretion of HKAS Executive. Where feasible, the assessment team will perform on-site witnessing assessment in areas having with higher OH&S risk levels. The assessment team may select initial certification audits including both stage 1 and 2 audits, surveillance or recertification audit for witnessing.

Appendix D

(informative)

MAJOR RELEVANT OH&S LEGISLATION IN HONG KONG

D.1 Gas Safety Ordinance (Cap. 51) and subsidiary regulations

D.2 Boilers and Pressure Vessels Ordinance (Cap. 56) and subsidiary regulations

D.3 Factories and Industrial Undertakings Ordinance (Cap. 59) and subsidiary regulations

D.4 Dangerous Goods Ordinance (Cap. 295) and subsidiary regulations

D.5 Occupational Safety and Health Council Ordinance (Cap. 398)

D.6 Electricity Ordinance (Cap. 406) and subsidiary regulations

D.7 Builder's Lifts and Tower Working Platforms (Safety) Ordinance (Cap. 470) and subsidiary regulations

D.8 Fire Safety (Commercial Premises) Ordinance (Cap. 502)

D.9 Occupational Safety and Health Ordinance (Cap. 509) and subsidiary regulations

Appendix E
(normative)
AUDIT TIME DETERMINATION

E.1 This Appendix is exclusively for OHSMS certification to OHSAS 18001 providing guidance on determining audit time required by a certification body for auditing the occupational health and safety management system of organisations of various sizes and complexity.

E.2 Table 1 presents audit durations calculated in auditor days on the basis of 8 audit hours per day. The number of auditor days allocated shall not be reduced at the planning stages by programming longer hours per working day. The audit duration is determined based on effective number of personnel and occupational health and safety risk level of an applicant organisation to be audited.

E.3 In Table 1, there are four risk levels, i.e., high, medium (med), low and limited (lim). A certification body shall define the criteria for determining risk level in a documented procedure. Reference should be made to recent occupational safety and health statistics (e.g. statistics from the Labour Department and Hospital Authority) and updated reports / researches / updates from relevant international organisations or academic institutions (e.g. updates from the International Labour Organisation). As not all organisations in a specific business sector (e.g. construction, manufacturing) will always have the same risk level, it would not be appropriate to assign risk levels purely based on the NACE code. Instead, the certification body shall consider the specific activities performed by the applicant organisation when determining its risk level. The rationale of determining the risk level for an applicant organisation shall be recorded.

E.4 The audit duration obtained from Table 1 shall be adjusted up or down depending on other relevant factors. The rationale for such adjustment shall be recorded. E.6 gives examples of such factors. It is unlikely that a reduction of more than 30% from the audit duration in Table 1 can be justified.

E.5 The total on-site active audit duration shall be at least 80% of the determined audit

duration.

E.6 Surveillance and recertification audit duration for a given organisation should be proportional to the time spent on initial certification audits (stage 1 + stage 2), with the total amount of time spent being about 1/3 and 2/3 of the time spent on the initial certification audits respectively, rounded up to the nearest 0.5 day. A certification body shall obtain up-to-date client information for planning surveillance and recertification audits. The audit duration shall be reviewed from time to time prior to every surveillance and recertification audits in considering of changes in the organisation, system maturity, etc. The certification body shall record the justification of audit time determination for all surveillance and recertification audits.

E.7 Where an organisation works shifts, the extent a shift shall be audited depends on its occupational health and safety system and risk level. The certification body shall record the justification for not auditing any particular shift.

E.8 The following are examples of additional factors which should be considered for audit time determination.

(a) Factors that may extend audit durations:

- Complicated auditing logistics, e.g., having to carry audit at more than one location or building, having to travel long distance between sites, or at non-consecutive dates;
- Language barrier, e.g., staff speaking in more than one language and the need for interpreter;
- OHSMS is implemented in different ways in different parts of the organisation or at different site. For example, they may have conducted hazard identification and risk assessment activities differently;
- Extreme environments, e.g. extremes of heat, cold, humidity, radiation, etc.;
- Hazardous work activities are involved.

(b) Factors that may shorten audit durations:

- The occupational health and safety management system is a mature system with proven performance and stability;

- Significant proportion of staff carry out a similar simple function with same OHSMS in place;
- Client preparedness for OHSMS certification.

Table 1 Audit Time Determination Table

Effective Number of Personnel *	Audit Time (Days) (Stage 1 + Stage 2)				Effective Number of Personnel	Audit Time (Days) (Stage 1 + Stage 2)			
	High	Med	Low	Lim		High	Med	Low	Lim
1 – 5	3	2.5	2.5	2.5	626 – 875	17	13	10	6.5
6 – 10	3.5	3	3	3	876 – 1175	19	15	11	7
11 – 15	4.5	3.5	3	3	1176 – 1550	20	16	12	7.5
16 – 25	5.5	4.5	3.5	3	1551 – 2025	21	17	12	8
26 – 45	7	5.5	4	3	2026 – 2675	23	18	13	8.5
46 – 65	8	6	4.5	3.5	2676 – 3450	25	19	14	9
65 – 85	9	7	5	3.5	3451 – 4350	27	20	15	10
86 – 125	11	8	5.5	4	4351 – 5450	28	21	16	11
126 – 175	12	9	6	4.5	5451 – 6800	30	23	17	12
176 – 275	13	10	7	5	6801 – 8500	32	25	19	13
276 – 425	15	11	8	5.5	8501 - 10700	34	27	20	14
426 – 625	16	12	9	6	> 10700 **	Follow progression above			

Remarks:

* – Effective number of personnel refers to total number of personnel working in all geographic locations included in the scope of certification regardless whether those personnel are direct employed by an applicant organisation or not.

** – The certification body's procedure may provide for audit duration for a number of employee exceeding 10700. Such audit duration should follow the progression in Table 1 in a consistent fashion.