

EHS CONCEPTS

ISO 45001 TOP FINDINGS, FIXED

The seven clauses auditors write up again and again, and the leadership fixes that close them for good. A free field guide.

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Keep your people whole.

FROM RYAN

The certificate is not the system

The examples in this letter (the binder, the committee, the drill, the investigation) are composites to show the pattern, not reports of real events.

I have seen beautiful ISO 45001 binders on sites where the risk assessment had not been opened since the consultant left. A safety committee with perfect minutes and no hourly worker who could name a single thing it changed. An emergency plan nobody had drilled. An incident investigation that ended with “employee retrained.”

Auditors see the same thing. LRQA, one of the large certification bodies, reported that its top five ISO 45001 nonconformities showed up in almost half of the audits its auditors performed in the first year of the standard. Published auditor guidance keeps naming the same clauses: worker participation, hazard identification, emergency preparedness, incident investigation, management review, legal requirements, and competence.

None of those are paperwork clauses. Each one asks whether leaders built a system that works when no one is watching. That is why they keep getting written up. You cannot fake consultation, a tested emergency response, or a root cause that changed something.

For each of the seven you get the pain point, what auditors find, the root causes, the requirement in plain words (with the U.S. law it overlaps), controls that work, a printable self-audit, who owns what, and one question to ask on the floor.

Whether or not you ever certify, these seven are the backbone of a safety program that works. Start with the one your last audit, or your last serious incident, pointed at.

Ryan L. Rinehart

Founder, EHS Concepts — The Ways of Safety

Keep your people whole.



EHS CONCEPTS
— THE WAYS OF SAFETY —

THE VERIFIED NUMBERS

Where ISO 45001 stands in 2026

542,527

Valid ISO 45001:2018 certificates worldwide at the end of 2024, covering 941,546 sites (ISO Survey 2024, as reproduced by Global Standards) (not verified on iso.org)

~half

Share of LRQA's first-year ISO 45001 audits that found at least one of its top five nonconformities

100+

ISO 45001 lead auditors interviewed for GSDC's list of the 100 most frequent audit failures; all seven clauses in this guide are in its top 10

2018

ISO 45001 first published (March 2018). Reviewed and confirmed in 2024, with a climate change amendment (Amd 1:2024)

1H 2027

When ISO says ISO/DIS 45001 (second edition) is expected to replace ISO 45001:2018 (iso.org). DIS voting closed Sept. 9, 2026

5,070

U.S. fatal work injuries in 2024 (BLS). The system exists to change that number, not to pass an audit

The auditor-reported findings are guidance, not official data. The certificate count of 542,527 (not verified on iso.org) comes from the ISO Survey 2024 as reproduced by Global Standards. Sources: ISO Survey of Management System Standard Certifications 2024 (ISO and IAF), as reproduced by Global Standards because the survey is now behind a login on IAF CertSearch; iso.org catalogue pages for ISO 45001:2018 and ISO/DIS 45001 (checked Oct. 13, 2026); LRQA, "Top five nonconformities" (article page; the full article is behind a form and was not read); GSDC, "Top 100 ISO 45001:2018 Lead Auditor Audit Failures"; BLS CFI 2024. There is no official, published frequency ranking of ISO 45001 nonconformities. ISO Survey participation varies by year (China's reporting changed between 2023 and 2024), so do not read the certificate count as a trend.

The seven clauses in this guide

	CLAUSE	THE RECURRING FINDING	POSITION IN GSDC TOP 10
1	6.1.2 Hazard identification and assessment of risks	Risk assessments that are generic, outdated, or skip routine work, contractors, and human factors	No. 2
2	5.4 Consultation and participation of workers	A committee and sign-in sheets, but no evidence non-managerial workers shaped any decision	No. 3
3	8.2 Emergency preparedness and response	Plans that exist but are untested, outdated, or unknown to contractors and new hires	No. 4
4	10.2 Incident, nonconformity and corrective action	Investigations that stop at the immediate cause; actions closed but never checked for effectiveness	No. 6
5	9.3 Management review	Reviews missing required inputs, with no decisions, owners, or resources as outputs	No. 7
6	6.1.3 Legal and other requirements (with 9.1.2)	Legal register out of date; no evaluation of whether you actually comply	No. 8
7	7.2 Competence	Training records exist, but competence for the hazard is not defined or checked	No. 9

Order follows the position of each clause in GSDC's list of frequent audit failures (built from interviews with 100+ lead auditors). GSDC does not publish counts, so the order is not a measured frequency. Each finding is also named in other published auditor

guidance listed in Sources. GSDC's No. 1 (5.3 roles and responsibilities), No. 5 (6.2.1 objectives), and No. 10 (9.1.1 performance evaluation) are covered inside the seven.

BEFORE THE SEVEN CLAUSES

The five basics that sit under all seven

ISO 45001 clause 5.1 Leadership and commitment · ISO · final	Top management takes overall accountability for preventing work-related injury and ill health, provides resources, protects workers from reprisal for reporting, and supports the people who run the system. It cannot be delegated to the safety manager.
ISO 45001 clause 8.1.2 Hierarchy of controls · ISO · final	Eliminate hazards and reduce risk in this order: elimination, substitution, engineering controls and reorganizing work, administrative controls including training, then PPE.
OSH Act Sec. 5(a)(1) General Duty Clause · BOTH · final	In the U.S., certification does not replace the law. Keep the workplace free of recognized hazards likely to cause death or serious harm, and meet every OSHA standard that applies.
29 CFR 1904.35 and OSH Act 11(c) Employee involvement · BOTH · final	Workers must know how to report injuries and illnesses, the procedure cannot discourage reporting, and you may not retaliate. This is the legal floor under ISO's worker participation clause.
OSHA Recommended Practices Safety and health programs · GUIDANCE	OSHA's free framework for small and mid-size employers: seven core elements, starting with management leadership and worker participation. It lines up closely with ISO 45001 and costs nothing.

Tags: ISO = requirement of ISO 45001:2018, a voluntary standard; it binds you only if you choose to certify or a contract requires it. GI = general industry (29 CFR 1910). CON = construction (29 CFR 1926). BOTH = applies to both (the OSH Act, 29 CFR 1904). GUIDANCE = advisory; not a rule.

Ten-minute foundation check

#	CHECK	YES	NO
1	The top leader can explain, without notes, what the OH&S system is for and what it changed this year.	☐	☐
2	Resources asked for in the last management review were approved or refused in writing, with a reason.	☐	☐
3	Workers can say how to report an injury, a hazard, or a near miss, and say they would.	☐	☐
4	The last three corrective actions were checked in the field for effectiveness, not just closed.	☐	☐
5	The legal register shows a review date in the last 12 months and lists the OSHA rules that apply here.	☐	☐
6	Controls for the top risks are above PPE on the hierarchy, or there is a written reason they are not.	☐	☐
7	Someone outside the safety department can find the current risk assessment for their own job.	☐	☐
8	Internal audits include interviews with hourly workers on the floor, not just document reviews.	☐	☐

HOW TO USE THIS GUIDE

Walk it. Score it. Own it.

1. Start with the clause your last audit, internal audit, or serious incident pointed at, not the first one in this guide.
2. Print the self-audit page. Take it to one process, one crew, or one shift. Thirty minutes on the floor.
3. Score what you can see, hear from workers, or put your hand on, not what the manual says. If the manual and the floor disagree, the manual is wrong until the floor changes.
4. Every “No” gets one owner and one date before you leave. Live hazards get stopped now.
5. Walk it again in 30 days, then feed the results to management review. A fix that is not verified is a wish.

Spotlight: management of change, the clause behind the clauses

THE PAIN POINT **A new packaging line goes in over a holiday weekend. Nobody updates the risk assessment, the emergency map, or the training matrix. The first audit finding is under 6.1.2. The first injury is two weeks later.** (illustrative)

Clause 8.1.3 asks you to plan and control temporary and permanent changes that affect OH&S: new products, processes, equipment, sites, staffing, legal requirements, and knowledge about hazards. GSDC lists management of change among its top 20 audit failures, and published auditor guidance names it as a recurring finding.

Most findings in this guide start as a change nobody managed. Fix the change process and four other clauses get easier: the risk assessment stays current, the emergency plan matches the floor, competence keeps up with the equipment, and management review sees what changed.

- ☐ There is a trigger list of changes that require an OH&S review before they go live (equipment, chemicals, layout, staffing, contractors).
- ☐ The last change on this site has a signed review that updated the risk assessment and training.

USE THIS EVERY TIME

When you find a gap: the eight-step response

1. Stop or contain.	If the gap is a live hazard (an unassessed task running now, an untested emergency route that is blocked, a worker doing a job they are not competent for), stop that task now. Anyone can call it. Stop is a right on this site. Restart is a decision. A named person makes it after the control is in place.
2. Fix the condition first.	Control the hazard on the floor. Then fix the documented information so it says what is true.
3. Find the decision that allowed it.	Ask what made the gap normal: a review cycle nobody owns, a committee with no budget, a change rushed for a deadline. Do not stop at “the procedure was not followed.”
4. One owner. One date.	One name, not a department. One date, not “next audit.”
5. Verify in the field.	The owner shows the fix on the floor. Check effectiveness in 30 days, as clause 10.2 requires.
6. Look sideways.	If it is in one process, one site, or one shift, check the others. Clause 10.2 asks whether similar nonconformities exist or could occur.
7. Protect the person who raised it.	Thank them and tell them what changed. Retaliation for reporting is illegal under Section 11(c) of the OSH Act, and protecting workers from reprisal is a top-management duty in clause 5.1.
8. Get help when you need it.	OSHA's On-Site Consultation Program is free, confidential, and separate from enforcement for small and mid-size employers (osha.gov/consultation). Your certification body can do a pre-assessment, and your insurer's loss-control staff are a free resource.

Leaders own the conditions. Workers make choices inside the conditions we build. When a gap shows up, the first question is not “who did it?” It is “what did we build, fund, schedule, or tolerate that made this normal?”

This guide is a practical summary for planning and self-audit. It is not legal advice, does not reproduce or replace the text of ISO 45001, and is not affiliated with ISO, LRQA, GSDC, or any certification body. ISO 45001 is voluntary; OSHA and state rules are not. When this guide and a regulation or the standard disagree, the regulation or the standard controls. A second edition of ISO 45001 is expected in the first half of 2027 (ISO/DIS 45001, [iso.org](https://www.iso.org)); recheck clause numbers and transition rules when it is published.

01 Hazard identification and risk assessment (6.1.2)

ISO 45001 6.1.2.1, 6.1.2.2 [ISO] · 29 CFR 1910.132(d) [GI] · 1926.20(b)(2) [CON] · OSH Act 5(a)(1) [BOTH]

No. 2

in GSDC's list of frequent ISO 45001 audit failures

Routine

work is where most incidents happen, and where assessments are thinnest

1910.132(d)

U.S. rule requiring a certified written hazard assessment for PPE

THE PAIN POINT The risk register was built in a two-day workshop three years ago. Since then the site added a second shift, a new chemical, and a contractor crew. The register has not changed a word. (illustrative)

What auditors find

Guidance: auditor-reported findings; no official frequency data exists. GSDC lists incomplete or outdated risk assessments as the No. 2 failure among the 100 it collected from lead auditors. Audit Workshop reports a very common nonconformity is a process that covers high-risk and non-routine work well but misses routine tasks, where most incidents occur, and that auditors also look for human factors and psychosocial hazards such as fatigue and excessive workload. A register built once and never updated is the typical pattern.

Why it really happens

Not a paperwork problem. These are the system and leadership conditions that make the finding predictable.

- The assessment was a project with an end date, not a process with an owner.
- It was written in the office by people who do not do the work.
- Changes (new equipment, chemicals, shifts, contractors) do not trigger a review.
- Routine tasks feel familiar, so they are scored low or skipped.
- Human factors, workload, and work organization feel too soft to score, so they are left out.

REQUIREMENTS AND CONTROLS · HAZARD IDENTIFICATION AND RISK ASSESSMENT (6.1.2)

What the standard and the law require, in plain words

ISO 6.1.2.1 · ISO · final	Run an ongoing, proactive process to identify hazards. Consider routine and non-routine activities, emergencies, everyone at the workplace (workers, contractors, visitors), human factors, how work is organized, social factors such as workload and harassment, past incidents, and changes.
ISO 6.1.2.2 · ISO · final	Assess the risks from those hazards and from the system itself, using a method that is proactive rather than reactive, and keep documented information on the method and the criteria.
1910.132(d) · GI · final	Assess the workplace for hazards that require PPE and certify it in writing: the workplace evaluated, who certified it, and the date.
1926.20(b)(2) · CON · final	Construction safety programs include frequent and regular inspections of job sites, materials, and equipment by competent persons.
OSH Act 5(a)(1) · BOTH · final	Recognized hazards with no specific OSHA standard (heat, ergonomics, workplace violence) are still your duty. A risk assessment that skips them leaves you exposed under the General Duty Clause.

ISO 45001 requirements are paraphrased, not quoted; buy the standard (iso.org or ANSI) for the exact text. U.S. federal regulatory text checked on eCFR (current to Oct. 8, 2026) on Oct. 13, 2026. State-plan states may have different or additional rules. Tags: ISO = requirement of ISO 45001:2018, a voluntary standard; it binds you only if you choose to certify or a contract requires it. GI = general industry (29 CFR 1910). CON = construction (29 CFR 1926). BOTH = applies to both (the OSH Act, 29 CFR 1904). GUIDANCE = advisory; not a rule.

Controls that work, in hierarchy order

Eliminate	Use the assessment to remove the task, not just score it: redesign, automate, or stop doing the riskiest routine jobs.
Engineer	Assess the job with the people who do it, at the job. Video or walk the task step by step.
Administrative	Trigger list: new equipment, chemical, layout, shift pattern, contractor, or incident means the assessment is reviewed before work continues. Annual full review with a named owner.
Leadership	Leaders review the top 10 risks quarterly and fund controls above PPE.
Small-shop fix	Pick the five jobs people do every day. Walk each with the worker, list the hazards, and update the register this month.

Leaders own the conditions. If the system only works the week before the audit, it is not a system. Build it so the evidence is a by-product of how the work runs every day.

30-MINUTE SELF-AUDIT · PRINT AND TAKE IT TO THE FLOOR, NOT THE CONFERENCE ROOM

01 · Hazard identification and risk assessment (6.1.2)

SITE / PROCESS	CLAUSE	AUDITOR	DATE
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#	CHECK WHAT YOU CAN SEE OR PUT YOUR HAND ON	YES	NO	N/A	NOTES
1	The risk assessment for this area was reviewed in the last 12 months, and the date is on it.	☐	☐	☐	
2	It covers routine daily tasks, not just high-risk or non-routine work.	☐	☐	☐	
3	Contractors and visitors working here are included.	☐	☐	☐	
4	Workers who do the job were involved, and can say how.	☐	☐	☐	
5	The last change in this area (equipment, chemical, layout) triggered a review.	☐	☐	☐	
6	Human factors and workload are considered (fatigue, shift length, staffing).	☐	☐	☐	
7	Controls listed in the assessment are actually in place when you look.	☐	☐	☐	
8	The PPE hazard assessment is certified in writing (GI).	☐	☐	☐	
9	Emergency scenarios for this area are identified.	☐	☐	☐	
10	Workers can name the top three hazards in their job and the control for each.	☐	☐	☐	

#	GAP FOUND	OWNER (ONE NAME)	DUE	VERIFIED

Rule: any “No” that is a live exposure gets stopped or contained before you leave the area. Stop is a right on this site. Restart is a decision. A named person makes it after the control is in place.

PREVENTION PLAYBOOK · HAZARD IDENTIFICATION AND RISK ASSESSMENT (6.1.2)

Who owns it

Top management	Funds controls for the top risks and reviews them quarterly.
Operations manager	Owns the assessment for the area and triggers reviews when things change.
Supervisor	Walks the task with workers and confirms controls are in place.
Workers	Help identify hazards in their own jobs; have the right to stop.
Safety lead	Owns the method, trains assessors, and audits quality.

How to verify it is working in the field

- Pick one routine task. Compare the assessment line by line with what you see.
- Ask three workers to name the top hazard in their job. Check it is in the register.
- List the last five changes on site. Check each one triggered a review.

TOOLBOX TALK STARTER

What is the riskiest thing you do here every day that nobody thinks about anymore?

Ask it at the job, not in the break room. Then listen. Write down what you hear and give it an owner before you leave.

IF YOU FIND A GAP

If a task is running with a hazard nobody assessed, control it now (stop, guard, or change the method). Then update the assessment with the worker and name the owner and date. Then run the eight-step gap response at the front of this guide.

02 Worker consultation and participation (5.4)

ISO 45001 5.4 [ISO] · 29 CFR 1904.35 [BOTH] · OSH Act 11(c) [BOTH] · OSHA Recommended Practices [GUIDANCE]

No. 3

in GSDC's list of frequent ISO 45001 audit failures

Non-managerial

workers are the group ISO singles out for consultation and participation

1904.35

U.S. rule: reporting procedures must not discourage workers

THE PAIN POINT The safety committee meets monthly. The minutes are perfect. Ask the forklift operators what the committee changed this year, and they ask what committee. (illustrative)

What auditors find

Guidance: auditor-reported findings; no official frequency data exists. GSDC lists minimal or absent worker participation as the No. 3 audit failure. Audit Workshop describes the most common version: a toolbox talk register or committee minutes exist, but there is no evidence workers were actually consulted on specific OH&S decisions. Informing workers of decisions already made is not consultation, and auditors interview workers on the floor to test it.

Why it really happens

Not a paperwork problem. These are the system and leadership conditions that make the finding predictable.

- The committee is run by managers, and the agenda is set before workers arrive.
- Workers are told about decisions instead of asked before them.
- There is no time, pay, or training for workers to take part.
- People have seen reports go nowhere, or seen someone punished for speaking up.
- Language, literacy, and shift patterns keep whole groups out of the conversation.

REQUIREMENTS AND CONTROLS · WORKER CONSULTATION AND PARTICIPATION (5.4)

What the standard and the law require, in plain words

ISO 5.4 · ISO · final	Set up processes for consultation and participation of workers at all levels, and their representatives. Provide the time, training, and resources; remove barriers such as language, literacy, and fear of reprisal.
ISO 5.4(d), (e) · ISO · final	Consult non-managerial workers on things like the policy, legal requirements, objectives, and contractor controls. Have them participate in hazard identification, risk control, training needs, and incident investigation.
29 CFR 1904.35 · BOTH · final	Set up a reasonable way for workers to report injuries and illnesses; it cannot deter reporting. Tell workers they have the right to report and that retaliation is prohibited.
OSH Act 11(c) · BOTH · final	You may not punish a worker for raising a safety concern or reporting an injury.
OSHA Recommended Practices · GUIDANCE	Worker participation is the second of OSHA's seven core elements: workers help find hazards, investigate incidents, and evaluate the program.

ISO 45001 requirements are paraphrased, not quoted; buy the standard (iso.org or ANSI) for the exact text. U.S. federal regulatory text checked on eCFR (current to Oct. 8, 2026) on Oct. 13, 2026. State-plan states may have different or additional rules. Tags: ISO = requirement of ISO 45001:2018, a voluntary standard; it binds you only if you choose to certify or a contract requires it. GI = general industry (29 CFR 1910). CON = construction (29 CFR 1926). BOTH = applies to both (the OSH Act, 29 CFR 1904). GUIDANCE = advisory; not a rule.

Controls that work, in hierarchy order

Eliminate	Remove the reasons people stay quiet: discipline tied to reporting, incentives that reward low injury counts, managers who shoot the messenger.
Engineer	Make it easy: hazard cards at the time clock, a QR code in the break room, reports in the languages your crew speaks, a visible board showing what was fixed.
Administrative	Hourly workers on every risk assessment and incident investigation. Committee with a worker co-chair, paid time, and a small budget. Ask before you decide, and record what you heard.
Leadership	Leaders answer every report within a set time and close the loop in person.
Small-shop fix	Before the next equipment purchase or layout change, ask the crew who will use it. Write down what they said and what you changed because of it.

Leaders own the conditions. If the system only works the week before the audit, it is not a system. Build it so the evidence is a by-product of how the work runs every day.

30-MINUTE SELF-AUDIT · PRINT AND TAKE IT TO THE FLOOR, NOT THE CONFERENCE ROOM

02 · Worker consultation and participation (5.4)

SITE / PROCESS	CLAUSE	AUDITOR	DATE
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#	CHECK WHAT YOU CAN SEE OR PUT YOUR HAND ON	YES	NO	N/A	NOTES
1	Hourly workers can name at least one safety change made because a worker asked for it.	☐	☐	☐	
2	Workers took part in the last risk assessment for their area.	☐	☐	☐	
3	Workers took part in the last incident investigation.	☐	☐	☐	
4	There is a reporting method workers actually use, in their language.	☐	☐	☐	
5	The last five reports got a response within the promised time.	☐	☐	☐	
6	Committee members include non-managerial workers who are paid for the time.	☐	☐	☐	
7	Workers were asked before the last change that affected their work.	☐	☐	☐	
8	Workers know they have the right to report and cannot be punished for it.	☐	☐	☐	
9	No incentive or discipline rule discourages injury reporting.	☐	☐	☐	
10	Results of consultation are recorded, including what changed.	☐	☐	☐	

#	GAP FOUND	OWNER (ONE NAME)	DUE	VERIFIED

Rule: any “No” that is a live exposure gets stopped or contained before you leave the area. Stop is a right on this site. Restart is a decision. A named person makes it after the control is in place.

PREVENTION PLAYBOOK · WORKER CONSULTATION AND PARTICIPATION (5.4)

Who owns it

Top management	Protects workers from reprisal and funds time for participation.
Operations manager	Brings workers into decisions before they are made.
Supervisor	Answers reports quickly and closes the loop with the crew.
Workers and representatives	Raise hazards, join assessments and investigations; have the right to stop.
Safety lead	Runs the reporting system and tracks response times and closures.

How to verify it is working in the field

- Interview five hourly workers on the floor. Ask what changed because of their input.
- Count reports in the last quarter and the median days to response.
- Check the last investigation team list for a non-managerial worker.

TOOLBOX TALK STARTER

When did someone here ask your opinion on a safety decision before it was made, and what happened?

Ask it at the job, not in the break room. Then listen. Write down what you hear and give it an owner before you leave.

IF YOU FIND A GAP

If workers say they would not report, treat it as a live hazard. Find out why, fix the barrier, and name the owner and date. Retaliation is illegal; stop it the day you find it. Then run the eight-step gap response at the front of this guide.

03 Emergency preparedness and response (8.2)

ISO 45001 8.2 [ISO] · 29 CFR 1910.38, 1910.39 [GI] · 1926.35 [CON] · 1904.39 [BOTH]

No. 4

in GSDC's list of frequent ISO 45001 audit failures

10

employees or fewer: an OSHA emergency action plan may be oral instead of written

Test

ISO requires periodic testing and exercise of the planned response

THE PAIN POINT The emergency plan lists a muster point that became a parking lot two years ago. The last drill was before the second shift existed. The contractor crew on the roof has never seen the plan. (illustrative)

What auditors find

Guidance: auditor-reported findings; no official frequency data exists. GSDC lists untested or outdated emergency response plans as the No. 4 audit failure. Common versions: no record that drills happened, drills that only cover day shift, plans that do not match the current layout, and contractors and visitors left out.

Why it really happens

Not a paperwork problem. These are the system and leadership conditions that make the finding predictable.

- The plan was written for the building as it was, not as it is.
- Drills are scheduled when it is convenient, so off-shifts and weekends never practice.
- No one evaluates the drill, so problems are found in the real emergency.
- Contractors, temps, and visitors are not briefed.
- First aid and rescue (falls, confined spaces) are assumed to be the fire department's job.

REQUIREMENTS AND CONTROLS · EMERGENCY PREPAREDNESS AND RESPONSE (8.2)

What the standard and the law require, in plain words

ISO 8.2 · ISO · final	Plan the response to the emergencies found in hazard identification, including first aid. Train people, periodically test and exercise the response, evaluate and revise it (including after tests and real events), and share information with workers, contractors, visitors, and emergency services.
1910.38 · GI · final	When an OSHA standard requires it, have an emergency action plan covering reporting, evacuation, accounting for employees, rescue and medical duties, and alarm. It must be written, unless you have 10 or fewer employees.
1910.39 · GI · final	When required, a fire prevention plan lists major fire hazards, ignition sources, controls, and who maintains fire equipment. Written unless 10 or fewer employees.
1926.35 · CON · final	Construction emergency action plans, when required by a Part 1926 standard, cover the same basics; written unless 10 or fewer employees.
1904.39 · BOTH · final	After the emergency: report a death within 8 hours, and an in-patient hospitalization, amputation, or loss of an eye within 24 hours.

ISO 45001 requirements are paraphrased, not quoted; buy the standard (iso.org or ANSI) for the exact text. U.S. federal regulatory text checked on eCFR (current to Oct. 8, 2026) on Oct. 13, 2026. State-plan states may have different or additional rules. Tags: ISO = requirement of ISO 45001:2018, a voluntary standard; it binds you only if you choose to certify or a contract requires it. GI = general industry (29 CFR 1910). CON = construction (29 CFR 1926). BOTH = applies to both (the OSH Act, 29 CFR 1904). GUIDANCE = advisory; not a rule.

Controls that work, in hierarchy order

Eliminate	Reduce the emergencies you could have: smaller chemical inventories, fewer ignition sources, fewer lone-worker situations.
Engineer	Alarms people can hear and see in every area, marked and lit exits, eyewash and showers that work, rescue equipment staged for falls and confined spaces.
Administrative	Drill every shift, including nights and weekends. Evaluate each drill with a short written debrief and actions. Brief contractors and visitors on arrival.
Leadership	Leaders take part in drills and fund the fixes they reveal.
Small-shop fix	Run a five-minute tabletop with each shift this month: "Fire in the paint booth, go." Write down what broke, fix the top two.

Leaders own the conditions. If the system only works the week before the audit, it is not a system. Build it so the evidence is a by-product of how the work runs every day.

30-MINUTE SELF-AUDIT · PRINT AND TAKE IT TO THE FLOOR, NOT THE CONFERENCE ROOM

03 · Emergency preparedness and response (8.2)

SITE / PROCESS	CLAUSE	AUDITOR	DATE
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#	CHECK WHAT YOU CAN SEE OR PUT YOUR HAND ON	YES	NO	N/A	NOTES
1	The emergency plan matches the current layout, exits, and muster points.	☐	☐	☐	
2	Every shift, including nights and weekends, has drilled in the last 12 months.	☐	☐	☐	
3	Each drill has a written evaluation with actions and owners.	☐	☐	☐	
4	Contractors and visitors are briefed on alarms, exits, and muster points.	☐	☐	☐	
5	Alarms can be heard or seen in every area, including noisy and remote ones.	☐	☐	☐	
6	Exits are marked, lit, and unobstructed.	☐	☐	☐	
7	First aid supplies and trained responders are available on every shift.	☐	☐	☐	
8	Rescue plans exist for falls and confined spaces where those hazards exist.	☐	☐	☐	
9	Emergency services know the site's hazards (chemicals, access, layout).	☐	☐	☐	
10	Workers can say what they do in the first 60 seconds of an alarm.	☐	☐	☐	

#	GAP FOUND	OWNER (ONE NAME)	DUE	VERIFIED

Rule: any "No" that is a live exposure gets stopped or contained before you leave the area. Stop is a right on this site. Restart is a decision. A named person makes it after the control is in place.

PREVENTION PLAYBOOK · EMERGENCY PREPAREDNESS AND RESPONSE (8.2)

Who owns it

Top management	Funds alarms, equipment, and drill time on every shift.
Facility manager	Keeps the plan matched to the building and coordinates with emergency services.
Supervisor	Runs drills for the shift and accounts for every person.
Workers	Know the plan, report blocked exits, and have the right to stop.
Safety lead	Schedules drills, writes evaluations, and tracks fixes.

How to verify it is working in the field

- Walk the evacuation route from the farthest work area and time it.
- Ask a night-shift worker and a contractor where the muster point is.
- Pull the last drill evaluation and check that its actions were closed.

TOOLBOX TALK STARTER

If the alarm went off right now, where would you go, and who would know if you did not get there?

Ask it at the job, not in the break room. Then listen. Write down what you hear and give it an owner before you leave.

IF YOU FIND A GAP

If an exit is blocked or an alarm does not work, fix it or post a fire watch now. Name the owner and date for updating the plan and drilling the affected shift. Then run the eight-step gap response at the front of this guide.

04 Incident investigation and corrective action (10.2)

ISO 45001 10.2 [ISO] · 29 CFR 1904 [BOTH] · 1910.119(m) PSM [GI] · OSHA Recommended Practices [GUIDANCE]

No. 6

in GSDC's list of frequent ISO 45001 audit failures

48 hrs

deadline to start a PSM incident investigation (1910.119(m))

Effectiveness

ISO requires you to review whether the action worked

THE PAIN POINT A worker's hand is caught in a conveyor. The investigation says “employee failed to follow lockout; employee retrained.” Six months later, a different worker, same conveyor, same jam. (illustrative)

What auditors find

Guidance: auditor-reported findings; no official frequency data exists. GSDC lists investigations that lack root cause analysis as the No. 6 audit failure, and missing effectiveness checks on corrective actions as another top-20 item. Audit Workshop says the most common 10.2 nonconformity is an investigation that finds immediate causes but never reaches the underlying or systemic ones. “Retrained” and “reminded” are the tell.

Why it really happens

Not a paperwork problem. These are the system and leadership conditions that make the finding predictable.

- Investigations look for who, not what. Blame ends the inquiry early.
- Investigators are the supervisor of the area, with no time and no training.
- Actions that need money or a schedule change stall, so easy ones get picked.
- Actions are closed when assigned, not when verified.
- Near misses are not investigated, so the warnings are lost.

REQUIREMENTS AND CONTROLS · INCIDENT INVESTIGATION AND CORRECTIVE ACTION (10.2)

What the standard and the law require, in plain words

ISO 10.2 · ISO · final	When an incident or nonconformity occurs: control and correct it, then evaluate with worker participation whether corrective action is needed to remove the root causes. Investigate, find the causes, check whether similar ones exist or could occur, and review the risk assessment.
ISO 10.2 (continued) · ISO · final	Choose actions using the hierarchy of controls and management of change, assess new risks before acting, review the effectiveness of what you did, and keep records.
29 CFR 1904 · BOTH · final	Record work-related injuries and illnesses that meet the criteria on the OSHA 300 Log, and report severe injuries and deaths on time (1904.39).
1910.119(m) · GI · final	Under process safety management, start investigating any incident that resulted in or could have resulted in a catastrophic release within 48 hours, with a team that includes someone who knows the process.
OSHA Recommended Practices · GUIDANCE	Investigate incidents and near misses to find root causes, and involve workers in the investigation.

ISO 45001 requirements are paraphrased, not quoted; buy the standard (iso.org or ANSI) for the exact text. U.S. federal regulatory text checked on eCFR (current to Oct. 8, 2026) on Oct. 13, 2026. State-plan states may have different or additional rules. Tags: ISO = requirement of ISO 45001:2018, a voluntary standard; it binds you only if you choose to certify or a contract requires it. GI = general industry (29 CFR 1910). CON = construction (29 CFR 1926). BOTH = applies to both (the OSH Act, 29 CFR 1904). GUIDANCE = advisory; not a rule.

Controls that work, in hierarchy order

Eliminate	Pick actions at the top of the hierarchy: remove the pinch point, redesign the task. Retraining alone is not a corrective action for a design problem.
Engineer	Use a structured method (5 Whys, causal tree, learning teams) that keeps asking what made the error likely.
Administrative	Investigate serious near misses, not just injuries. Trained investigators with a worker on every team. Close an action only after a field check 30 to 90 days later.
Leadership	Leaders review every serious investigation and fund the systemic fix, or sign a written reason why not.
Small-shop fix	Ban “employee retrained” as a stand-alone action. Every investigation must name at least one condition change.

Leaders own the conditions. If the system only works the week before the audit, it is not a system. Build it so the evidence is a by-product of how the work runs every day.

30-MINUTE SELF-AUDIT · PRINT AND TAKE IT TO THE FLOOR, NOT THE CONFERENCE ROOM

04 · Incident investigation and corrective action (10.2)

SITE / PROCESS	CLAUSE	AUDITOR	DATE
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#	CHECK WHAT YOU CAN SEE OR PUT YOUR HAND ON	YES	NO	N/A	NOTES
1	The last three investigations named at least one system or condition cause, not just a person.	☐	☐	☐	
2	A worker who does the job was on each investigation team.	☐	☐	☐	
3	Corrective actions are above PPE and training on the hierarchy, or explain why not.	☐	☐	☐	
4	Each action has one owner and one due date.	☐	☐	☐	
5	Closed actions were verified in the field, with a date and name.	☐	☐	☐	
6	Similar equipment, tasks, or sites were checked after the last incident.	☐	☐	☐	
7	Serious near misses are investigated, not just recorded.	☐	☐	☐	
8	The risk assessment was updated after the last incident.	☐	☐	☐	
9	Recordable cases are on the 300 Log within 7 calendar days.	☐	☐	☐	
10	Workers were told what changed because of the last investigation.	☐	☐	☐	

#	GAP FOUND	OWNER (ONE NAME)	DUE	VERIFIED

Rule: any “No” that is a live exposure gets stopped or contained before you leave the area. Stop is a right on this site. Restart is a decision. A named person makes it after the control is in place.

PREVENTION PLAYBOOK · INCIDENT INVESTIGATION AND CORRECTIVE ACTION (10.2)

Who owns it

Top management	Funds systemic fixes and reviews every serious investigation.
Operations manager	Owns the actions in the area and their verification.
Supervisor	Secures the scene, starts the investigation, and involves the crew.
Workers	Join investigations and tell what really happened without fear; have the right to stop.
Safety lead	Trains investigators, audits quality, and tracks effectiveness checks.

How to verify it is working in the field

- Pull the last five investigations. Count how many ended at a person instead of a condition.
- Go see three closed actions in the field. Are they still in place and working?
- Ask a worker involved in the last incident what changed afterward.

TOOLBOX TALK STARTER

Think of the last incident here. What would have to be different so it could not happen the same way again?

Ask it at the job, not in the break room. Then listen. Write down what you hear and give it an owner before you leave.

IF YOU FIND A GAP

If a closed action is not in place, reopen it today and control the hazard. Name the owner and date, and check the same hazard on similar equipment. Then run the eight-step gap response at the front of this guide.

No. 7

in GSDC's list of frequent ISO 45001 audit failures

Top

management must do it; it cannot be handed to the safety manager

1904.32

U.S. rule: a company executive certifies the annual OSHA 300A summary

THE PAIN POINT Management review is a 40-slide deck the safety manager presents once a year. The minutes say “reviewed and accepted.” No decision, no budget, no owner. The same three risks are in next year's deck. (illustrative)

What auditors find

Guidance: auditor-reported findings; no official frequency data exists. GSDC lists management review among its top 10 audit failures, with the fix of using a structured agenda aligned to the clause and recording all inputs and decisions. The typical finding: required inputs missing (worker consultation, legal compliance, risks and opportunities), and outputs with no decisions, resources, or actions.

Why it really happens

Not a paperwork problem. These are the system and leadership conditions that make the finding predictable.

- The review is treated as a presentation, not a decision meeting.
- Top management attends briefly or sends a delegate.
- Inputs are lagging injury rates only, with nothing on risks, compliance, or worker input.
- Nobody tracks whether last year's decisions were carried out.
- Safety budget is decided in a different meeting by different people.

REQUIREMENTS AND CONTROLS · MANAGEMENT REVIEW (9.3)

What the standard and the law require, in plain words

ISO 9.3 inputs · ISO · final	At planned intervals, top management reviews: actions from last time; changes in issues, needs, legal requirements, and risks; how far policy and objectives were met; OH&S performance (incidents, corrective actions, monitoring, compliance evaluation, audits, worker consultation, risks and opportunities); resources; and communications.
ISO 9.3 outputs · ISO · final	Outputs include conclusions on whether the system is suitable, adequate, and effective; improvement opportunities; needed changes and resources; actions; and implications for strategic direction. Communicate relevant outputs to workers and keep records.
ISO 5.1 · ISO · final	Top management takes overall accountability and ensures the resources needed are available.
29 CFR 1904.32 · BOTH · final	A company executive must certify the annual OSHA 300A summary after examining the log. It is a legal moment to look at the data, not just sign it.
OSHA Recommended Practices · GUIDANCE	Program evaluation and improvement is a core element: leaders review performance and act on what they find.

ISO 45001 requirements are paraphrased, not quoted; buy the standard (iso.org or ANSI) for the exact text. U.S. federal regulatory text checked on eCFR (current to Oct. 8, 2026) on Oct. 13, 2026. State-plan states may have different or additional rules. Tags: ISO = requirement of ISO 45001:2018, a voluntary standard; it binds you only if you choose to certify or a contract requires it. GI = general industry (29 CFR 1910). CON = construction (29 CFR 1926). BOTH = applies to both (the OSH Act, 29 CFR 1904). GUIDANCE = advisory; not a rule.

Controls that work, in hierarchy order

Eliminate	Kill the slide deck. Run the review as a decision meeting with the agenda built from clause 9.3.
Engineer	One-page dashboard: top risks and their control status, open corrective actions, compliance gaps, worker input themes, leading and lagging indicators.
Administrative	Every input has an owner. Every output is a decision with one name, one date, and a budget line. Last review's actions are the first agenda item.
Leadership	Top management chairs it, in person, and tells workers what was decided.
Small-shop fix	Hold a quarterly one-hour review with the owner. Three questions: what are our top risks, what did we fix, what do we fund next?

Leaders own the conditions. If the system only works the week before the audit, it is not a system. Build it so the evidence is a by-product of how the work runs every day.

30-MINUTE SELF-AUDIT · PRINT AND TAKE IT TO THE FLOOR, NOT THE CONFERENCE ROOM

05 · Management review (9.3)

SITE / PROCESS	CLAUSE	AUDITOR	DATE
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#	CHECK WHAT YOU CAN SEE OR PUT YOUR HAND ON	YES	NO	N/A	NOTES
1	Top management chaired the last review in person.	☐	☐	☐	
2	The review covered every required input, including worker consultation and legal compliance.	☐	☐	☐	
3	Status of actions from the previous review was checked first.	☐	☐	☐	
4	Outputs include decisions with owners, dates, and resources.	☐	☐	☐	
5	At least one resource request was approved or refused in writing.	☐	☐	☐	
6	Top risks and the status of their controls were discussed.	☐	☐	☐	
7	Leading indicators (inspections, near misses, actions closed) were reviewed, not just injury rates.	☐	☐	☐	
8	Workers were told what the review decided.	☐	☐	☐	
9	The 300A was certified by a company executive who looked at the log.	☐	☐	☐	
10	Reviews happen at the planned interval, on the calendar a year ahead.	☐	☐	☐	

#	GAP FOUND	OWNER (ONE NAME)	DUE	VERIFIED

Rule: any “No” that is a live exposure gets stopped or contained before you leave the area. Stop is a right on this site. Restart is a decision. A named person makes it after the control is in place.

PREVENTION PLAYBOOK · MANAGEMENT REVIEW (9.3)

Who owns it

Top management	Chairs the review, makes the decisions, and funds them.
Operations leaders	Bring their area's risks, actions, and requests.
Supervisors	Bring worker input and floor-level problems.
Workers and representatives	Provide input through consultation and hear the outcomes.
Safety lead	Prepares the inputs and tracks the outputs to closure.

How to verify it is working in the field

- Read the last review's minutes. Count decisions with an owner, date, and budget.
- Check whether last year's review actions were completed.
- Ask a supervisor what the last management review decided.

TOOLBOX TALK STARTER

If you could put one safety problem in front of the owner for a decision, what would it be?

Ask it at the job, not in the break room. Then listen. Write down what you hear and give it an owner before you leave.

IF YOU FIND A GAP

If the review produced no decisions, schedule a decision session within 30 days with the top three risks and a resource ask for each. Name the owner. Then run the eight-step gap response at the front of this guide.

06 Legal requirements and compliance evaluation (6.1.3 and 9.1.2)

ISO 45001 6.1.3, 9.1.2 [ISO] · 29 CFR 1910 [GI] · 29 CFR 1926 [CON] · 29 CFR 1904 and OSH Act [BOTH]

No. 8

in GSDC's list of frequent ISO 45001 audit failures

9.1.2

the clause that asks whether you actually comply, not just list the law

Oct. 8, 2026

date the eCFR used for this guide was current to; rules change

THE PAIN POINT The legal register lists every OSHA standard in Part 1910, copied from a website in 2019. Nobody can say which ones apply to this plant, and the newest rule changes are not in it. (illustrative)

What auditors find

Guidance: auditor-reported findings; no official frequency data exists. GSDC lists legal and other requirements that are not tracked or updated as the No. 8 audit failure, and the lack of a compliance evaluation as another frequent one. Audit Workshop calls an out-of-date legal register the most frequent 6.1.3 nonconformity, and stresses that having a register is not the same as evaluating compliance with it.

Why it really happens

Not a paperwork problem. These are the system and leadership conditions that make the finding predictable.

- The register was bought or copied, not built from what this site actually does.
- Nobody owns watching for rule changes at federal, state, and local level.
- "Other requirements" (customer contracts, insurer, corporate standards) are left out.
- Compliance is assumed because there has not been an inspection.
- The register is not linked to the risk assessment, training, or inspections.

REQUIREMENTS AND CONTROLS · LEGAL REQUIREMENTS AND COMPLIANCE EVALUATION (6.1.3 AND 9.1.2)

What the standard and the law require, in plain words

ISO 6.1.3 · ISO · final	Determine and have access to up-to-date legal and other requirements that apply to your hazards and risks, decide how they apply and what to communicate, take them into account in the system, and keep the information current.
ISO 9.1.2 · ISO · final	Plan and run an evaluation of compliance: how often, by what method, act on gaps, keep knowledge of your compliance status, and keep records of the results.
29 CFR 1910 / 1926 · GI / CON · final	OSHA's general industry and construction standards apply by activity, not by industry label. A plant doing construction work or a contractor running a shop can face both.
29 CFR 1904 · BOTH · final	Recordkeeping applies to most employers with more than 10 employees, unless the industry is partially exempt. Reporting deaths and severe injuries (1904.39) applies to all employers under OSHA.
State plans · BOTH · final	22 OSHA-approved State Plans (21 states and Puerto Rico) cover private-sector workers, and 7 more cover only state and local government workers. They can be stricter than federal OSHA. Your register must show which one covers you.

ISO 45001 requirements are paraphrased, not quoted; buy the standard (iso.org or ANSI) for the exact text. U.S. federal regulatory text checked on eCFR (current to Oct. 8, 2026) on Oct. 13, 2026. State-plan states may have different or additional rules. Tags: ISO = requirement of ISO 45001:2018, a voluntary standard; it binds you only if you choose to certify or a contract requires it. GI = general industry (29 CFR 1910). CON = construction (29 CFR 1926). BOTH = applies to both (the OSH Act, 29 CFR 1904). GUIDANCE = advisory; not a rule.

Controls that work, in hierarchy order

Eliminate	Throw out the generic copy. Build the register from your activities, chemicals, equipment, and permits.
Engineer	For each requirement: who it applies to, what it requires, the control in place, the evidence, and the owner.
Administrative	Named owner watches for changes (OSHA, state plan, EPA, DOT, fire code) and updates the register quarterly. Annual compliance evaluation using the register as the checklist.
Leadership	Compliance gaps go to management review with a fix date and budget.
Small-shop fix	List the ten OSHA standards most likely to apply (start with your OSHA Top 10 exposure). For each, write the control and the evidence. Expand from there.

Leaders own the conditions. If the system only works the week before the audit, it is not a system. Build it so the evidence is a by-product of how the work runs every day.

30-MINUTE SELF-AUDIT · PRINT AND TAKE IT TO THE FLOOR, NOT THE CONFERENCE ROOM

06 · Legal requirements and compliance evaluation (6.1.3 and 9.1.2)

SITE / PROCESS	CLAUSE	AUDITOR	DATE
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#	CHECK WHAT YOU CAN SEE OR PUT YOUR HAND ON	YES	NO	N/A	NOTES
1	The legal register lists only the requirements that apply here, and says why.	☐	☐	☐	
2	It was reviewed in the last 12 months, and the reviewer is named.	☐	☐	☐	
3	It shows whether federal OSHA or a state plan covers the site.	☐	☐	☐	
4	Other requirements (customer, insurer, corporate) are included.	☐	☐	☐	
5	Each requirement has an owner and a link to the control or program.	☐	☐	☐	
6	A compliance evaluation was done in the last 12 months, with results recorded.	☐	☐	☐	
7	Gaps from the evaluation have owners, dates, and status.	☐	☐	☐	
8	Someone receives rule-change updates and can show the last one acted on.	☐	☐	☐	
9	Required written programs (HazCom, LOTO, respirator, EAP) exist and match the floor.	☐	☐	☐	
10	Required training and inspections in the register match the records.	☐	☐	☐	

#	GAP FOUND	OWNER (ONE NAME)	DUE	VERIFIED

Rule: any “No” that is a live exposure gets stopped or contained before you leave the area. Stop is a right on this site. Restart is a decision. A named person makes it after the control is in place.

PREVENTION PLAYBOOK · LEGAL REQUIREMENTS AND COMPLIANCE EVALUATION (6.1.3 AND 9.1.2)

Who owns it

Top management	Funds compliance gaps and accepts residual risk in writing only.
EHS manager	Owns the register, the change watch, and the compliance evaluation.
Operations manager	Owns the controls and evidence for requirements in the area.
Supervisor	Knows the requirements for the crew's work and checks them in the field.
Safety lead	Runs the annual evaluation and reports gaps to management review.

How to verify it is working in the field

- Pick five requirements from the register and find the evidence of compliance on the floor.
- Check the register for the most recent federal OSHA or state-plan change that affects you.
- Ask the register owner how they learned of the last rule change.

TOOLBOX TALK STARTER

Which rule do you think we would fail first if OSHA walked in today, and why?

Ask it at the job, not in the break room. Then listen. Write down what you hear and give it an owner before you leave.

IF YOU FIND A GAP

If a compliance gap is a live hazard, control it now. Then add it to the register with an owner, date, and budget, and report it at the next management review. Then run the eight-step gap response at the front of this guide.

07 Competence (7.2)

ISO 45001 7.2 [ISO] · 29 CFR 1910.147(c)(7), 1910.178(l) [GI] · 1926.21(b)(2), 1926.503 [CON]

No. 9

in GSDC's list of frequent ISO 45001 audit failures

3 yrs

maximum time between forklift operator evaluations (1910.178(l)(4)(iii))

Effective

ISO asks you to evaluate whether training worked, not just log it

THE PAIN POINT The training matrix is 100% green. The new maintenance tech has a lockout certificate from the last company. On day four, he locks out the wrong disconnect on a machine he has never seen. (illustrative)

What auditors find

Guidance: auditor-reported findings; no official frequency data exists. GSDC lists competence among its top 10 audit failures and again elsewhere in its top 100. The common finding: training records exist, but the competence needed for each job is not defined, outside certificates are accepted without checking the person can do the work here, and nobody evaluates whether training was effective.

Why it really happens

Not a paperwork problem. These are the system and leadership conditions that make the finding predictable.

- Competence is measured as hours in a classroom, not ability on the job.
- Job competence requirements were never written down, so there is nothing to check against.
- Certificates from other employers are accepted without a site-specific check.
- Supervisors are promoted for production skill and get no safety leadership training.
- Training is not repeated when equipment, procedures, or hazards change.

REQUIREMENTS AND CONTROLS · COMPETENCE (7.2)

What the standard and the law require, in plain words

ISO 7.2 · ISO · final	Decide the competence workers need where it affects OH&S, including the ability to identify hazards. Ensure they are competent through education, training, or experience; act to close gaps and evaluate whether the action worked; keep records as evidence.
1910.147(c)(7) · GI · final	Lockout: train authorized employees to recognize energy sources and the means of isolation; retrain when jobs, equipment, or procedures change or inspections show gaps.
1910.178(l) · GI · final	Forklift operators must be trained and evaluated in the workplace before operating, with a performance evaluation at least every three years.
1926.503 · CON · final	Fall protection training by a competent person, with a written certification record; retrain when the worker's understanding or the workplace changes.
1926.21(b)(2) · CON · final	Instruct each employee to recognize and avoid unsafe conditions on the job.

ISO 45001 requirements are paraphrased, not quoted; buy the standard (iso.org or ANSI) for the exact text. U.S. federal regulatory text checked on eCFR (current to Oct. 8, 2026) on Oct. 13, 2026. State-plan states may have different or additional rules. Tags: ISO = requirement of ISO 45001:2018, a voluntary standard; it binds you only if you choose to certify or a contract requires it. GI = general industry (29 CFR 1910). CON = construction (29 CFR 1926). BOTH = applies to both (the OSH Act, 29 CFR 1904). GUIDANCE = advisory; not a rule.

Controls that work, in hierarchy order

Eliminate	Design jobs and equipment so less depends on memory: interlocks, clear labeling, mistake-proofing.
Engineer	Competence matrix by job: required knowledge, skills, and hazard recognition, with how each is checked.
Administrative	Site-specific sign-off on the real equipment before working alone, regardless of outside certificates. Retrain on change. Observe and test, not just quiz.
Leadership	Train supervisors in hazard recognition, coaching, and stopping work, before they supervise.
Small-shop fix	For your three highest-risk tasks, write a one-page checklist of what a competent person can show. Have a qualified worker sign off each person on the floor.

Leaders own the conditions. If the system only works the week before the audit, it is not a system. Build it so the evidence is a by-product of how the work runs every day.

30-MINUTE SELF-AUDIT · PRINT AND TAKE IT TO THE FLOOR, NOT THE CONFERENCE ROOM

07 · Competence (7.2)

SITE / PROCESS	CLAUSE	AUDITOR	DATE
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#	CHECK WHAT YOU CAN SEE OR PUT YOUR HAND ON	YES	NO	N/A	NOTES
1	Competence requirements are written for jobs that affect safety.	☐	☐	☐	
2	Each worker doing a high-risk task has a site-specific sign-off on the actual equipment.	☐	☐	☐	
3	Outside certificates were verified with a practical check here.	☐	☐	☐	
4	Training effectiveness is evaluated by observation or test, not attendance.	☐	☐	☐	
5	Workers were retrained after the last equipment or procedure change.	☐	☐	☐	
6	Forklift operators have evaluations within the last three years.	☐	☐	☐	
7	Lockout-authorized employees can name the energy sources on the machine in front of them.	☐	☐	☐	
8	Supervisors have had safety leadership and hazard recognition training.	☐	☐	☐	
9	Temps and contractors are checked for competence before they start.	☐	☐	☐	
10	Records show who trained, what, when, and how competence was confirmed.	☐	☐	☐	

#	GAP FOUND	OWNER (ONE NAME)	DUE	VERIFIED

Rule: any “No” that is a live exposure gets stopped or contained before you leave the area. Stop is a right on this site. Restart is a decision. A named person makes it after the control is in place.

PREVENTION PLAYBOOK · COMPETENCE (7.2)

Who owns it

Top management	Funds training time and supervisor development.
Operations manager	Defines competence for each job and enforces sign-off before solo work.
Supervisor	Observes work, confirms competence, and pulls people from tasks they are not ready for.
Workers	Speak up when they are not trained for a task; have the right to stop.
Safety lead	Maintains the matrix and evaluates training effectiveness.

How to verify it is working in the field

- Ask a worker to walk you through lockout on their machine. Compare with the procedure.
- Pick three names from the matrix and check the sign-offs against the jobs they did this week.
- Ask a new supervisor how they would stop an unsafe job.

TOOLBOX TALK STARTER

What job here would you not want to do alone on your first week, and what would make you ready?

Ask it at the job, not in the break room. Then listen. Write down what you hear and give it an owner before you leave.

IF YOU FIND A GAP

If someone is doing a task they are not competent for, pull them from it now and pair them with a qualified worker. Name the owner and date for training and sign-off. Then run the eight-step gap response at the front of this guide.

CHECK OUR WORK

Sources

1. ISO, ISO 45001:2018 Occupational health and safety management systems, catalogue page (status, 2024 confirmation, Amd 1:2024)
<https://www.iso.org/standard/63787.html>
2. ISO, ISO/DIS 45001 (second edition draft), catalogue page (stage 40.60, close of voting Sept. 9, 2026; expected to replace the 2018 edition in the first half of 2027)
<https://www.iso.org/standard/45001/rev>
3. ISO/TC 283, "ISO 45001 Revision Reaches Draft International Standard Ballot Stage" (June 18, 2026)
<https://committee.iso.org/sites/tc283/home/news/content-left-area/news-and-updates/news.html>
4. Global Standards, ISO Survey 2024 infographic, reproducing the ISO and IAF ISO Survey of Management System Standard Certifications 2024 results (secondary source; the survey itself is now behind a login on IAF CertSearch)
https://globalstd.com/wp-content/uploads/2025/10/Infografia-ISO-Survey-2024_EN.pdf
5. LRQA, "ISO 45001: Top five nonconformities" (article landing page)
<https://www.lrqa.com/en-us/resources/iso-45001-top-5-nonconformities/>
6. GSDC, "ISO Survival Kit: Top 100 ISO 45001:2018 Lead Auditor Audit Failures" (PDF)
<https://gsdcdata.gsdcouncil.org/gsd/pdf/iso-survival-kit-top-100-iso-45001-lead-auditor-audit-failures.pdf>
7. Audit Workshop, "Common ISO 45001 Nonconformities and How to Avoid Them"
<https://auditworkshop.com/blog/common-iso-45001-nonconformities>
8. Audit Workshop, "Auditing the Legal Register Under ISO 45001 Clause 6.1.3"
<https://auditworkshop.com/blog/auditing-legal-register-clause-6-1-3>
9. OSHA, Recommended Practices for Safety and Health Programs
<https://www.osha.gov/safety-management>
10. U.S. Bureau of Labor Statistics, Census of Fatal Occupational Injuries Summary, 2024 (Feb. 19, 2026)
<https://www.bls.gov/news.release/cfoi.nr0.htm>
11. OSH Act Section 5, Duties (General Duty Clause)
<https://www.osha.gov/laws-regs/oshact/section5-duties>
12. OSH Act Section 11(c), anti-retaliation
https://www.osha.gov/laws-regs/oshact/section_11
13. 29 CFR 1904.35, employee involvement (recordkeeping), eCFR
<https://www.ecfr.gov/current/title-29/section-1904.35>
14. 29 CFR 1904.32, annual summary (executive certification), eCFR
<https://www.ecfr.gov/current/title-29/section-1904.32>
15. 29 CFR 1904.39, reporting fatalities and severe injuries, eCFR
<https://www.ecfr.gov/current/title-29/section-1904.39>
16. 29 CFR 1910.132, PPE general requirements (hazard assessment certification), eCFR
<https://www.ecfr.gov/current/title-29/section-1910.132>
17. 29 CFR 1910.38 and 1910.39, emergency action and fire prevention plans, eCFR
<https://www.ecfr.gov/current/title-29/part-1910/subpart-E>
18. 29 CFR 1926.35, employee emergency action plans (construction), eCFR
<https://www.ecfr.gov/current/title-29/section-1926.35>
19. 29 CFR 1910.119(m), process safety management, incident investigation, eCFR
<https://www.ecfr.gov/current/title-29/section-1910.119>
20. 29 CFR 1910.147, control of hazardous energy (training, annual periodic inspection), eCFR
<https://www.ecfr.gov/current/title-29/section-1910.147>

21. 29 CFR 1910.178(l), powered industrial truck operator training, eCFR
<https://www.ecfr.gov/current/title-29/section-1910.178>
22. 29 CFR 1926.20 and 1926.21, construction programs and training, eCFR
<https://www.ecfr.gov/current/title-29/part-1926/subpart-C>
23. OSHA, On-Site Consultation Program
<https://www.osha.gov/consultation>

Sources retrieved and checked October 13, 2026. This guide is a practical summary for planning and self-audit. It is not legal advice, does not reproduce or replace the text of ISO 45001, and is not affiliated with ISO, LRQA, GSDC, or any certification body. ISO 45001 is voluntary; OSHA and state rules are not. When this guide and a regulation or the standard disagree, the regulation or the standard controls. A second edition of ISO 45001 is expected in the first half of 2027 (ISO/DIS 45001, iso.org); recheck clause numbers and transition rules when it is published.

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