# Third party audits of the psychosocial work environment in occupational health and safety management systems

Pernille Hohnen[a,*], Peter Hasle[b]

[a] *Department of Culture and Global Studies, Aalborg University, Denmark*
[b] *Center for Industrial Production, Aalborg University, Copenhagen, Denmark*

## ARTICLE INFO

## ABSTRACT

Occupational health and safety management (OHSM) systems certified according to OHSAS 18,001 are gaining importance. A key element in OHSAS 18,001 is third party audits. Psychosocial risks are only briefly mentioned in the standard, and the question therefore remains whether audits in practice cover these risks to a sufficient extent. The article provides a first answer to this question through a study of the whole value chain from accreditation of certification bureaus to the subsequent audits and workplace reactions. The results indicate that the accreditation body pays limited attention to psychosocial risks. Furthermore, auditors are often uncertain as to how they should handle such risks. As a consequence, although auditors may pin point psychosocial work environment issues, auditing practices do not ensure a consistent and encompassing coverage of these issues in their audit reports. Of particular concern is the fact that the strongest instrument (non-conformity) is not utilised at all when auditing psychosocial work environment issues. In sum, the results call for stronger inclusion of the psychosocial work environment in the standard as well as in the accreditation and audit processes.

## 1. Introduction

Voluntary occupational health and safety management (OHSM) systems are becoming a key strategy for the improvement of the work environment. This development took momentum around the millennium, when the OHSAS 18,001 standard (BSI, 2008) was published and subsequently adopted in many countries. Although initiated by the British Standard Institute in collaboration with a small number of agencies in other countries, it is in practice being used as an international standard, and is expected to be replaced by a similar ISO standard. There are several reasons for this increase in importance. Among the most important reasons are the increasingly extensive supply chains in which the links become more dependent on documentation both upstream and downstream.

Research in certified OHSM systems has increased during the past few years, and a number of studies indicate that on average, companies are improving their OHS performance (Abad et al., 2013; Lo et al., 2014; Robson et al., 2007; Yoon et al., 2013), and research even suggests that a positive effect may be seen in economic performance (Abad et al., 2013; Lo et al., 2014). However, the positive outcome is not always given (Blewett and O'Keeffe, 2011; Gallagher and Underhill, 2012; Gallagher et al., 2003; Hohnen and Hasle, 2011), and recent studies have raised concerns about, in particular, the ability of certified

OHSM systems to address psychosocial work environment issues (Hohnen and Hasle, 2011; Jespersen et al., 2016a; Leka et al., 2011).

OHSM systems were born in the safety management tradition of large manufacturing companies in particular in the USA. It can be traced back to the 'Safety pays' movement in the 1930s (Heinrich, 1931), which was further developed by DuPont (Frick and Kempa, 2011), among others. The logics of these systems are therefore based on the prevention of accidents and physical risk, focusing on simple and clear causes, i.e. on effect relationships. However, many aspects of the psychosocial work environment are of an ambiguous nature without clear cause-effect relations, and it may therefore be more difficult to target psychosocial risks in these systems (Hasle et al., 2014; Jespersen et al., 2016b; Leka et al., 2011).

Audits constitute a key element in certified OHSM systems, and researchers have pointed towards a need for more knowledge about the role of the independent third party audits (Arntz-Gray, 2016; Gallagher et al., 2003). Prevailing research focuses on management systems within companies, while relatively little attention has been paid to the role of external audits. So far, only studies of the internal audits have been published (Bergh et al., 2015; Jespersen et al., 2016; Robson and Bigelow, 2010; Robson et al., 2012). Moreover, the scarce literature that does exist on external audits suggests that external audits do not necessarily fulfil their objectives, but merely function as rituals (Blewett

---

and O'Keeffe, 2011). Another point of critique has been that external auditing bureaus are dominated by economic interests in ensuring that the clients keep buying the audits (Zwetsloot et al., 2011), or they tend to neglect certain (complex) issues (Hohnen and Hasle, 2011). The need for an effective third-party audit function becomes even more important as OHSM systems become integrated in the work environment legislation, which is the case in Denmark (Jespersen et al., 2016b) and the Netherlands (Zwetsloot et al., 2011).

OHSAS 18,001 requires that the certified organisation complies with national legislation on the work environment. As psychosocial factors are included in for example the European framework directive on the work environment form 1989, these must be included in an OHSM system. However, the standard only briefly mentions psychosocial risks as 'mental health' and has no provisions on how to deal with this issue. The standard therefore offers limited advice to both the organisation establishing an OHSM system and to the certification bureau responsible for the subsequent audits.

The limited knowledge about audits and the potential challenges for auditing the psychosocial work environment call for studies of the present practice in this area. It is the aim of this paper to start filling this research gap. The question in focus is to understand how the OHSAS 18,001 standard's requirements are translated into auditable factors in the area of psychosocial work environment issues, and how, in practice, this translation comprehends the psychosocial work environment. The study is a particularly important contribution to the literature because it includes the first analysis of external audits of OHSM. We analyse the certification process as a regulatory chain where practices of addressing psychosocial work environment issues are seen to be determined by the interpretations of the explicit and implicit demands in the OHSAS standard by the accreditation body as well as by the external certification bureaus. The study focuses on how psychosocial risks are understood and transferred into practice in external audits in concreteworkplaces.

The paper is based on a Danish case study covering empirical data from the accreditation body, a certification bureau and observations of auditing practices in selected workplaces in two Danish OHSAS 18,001 certified municipalities. In the paper we study certification as a form of regulation based on a sociological approach developed by Brunsson and Jacobsson (2000) and Brunsson et al. (2012). We expand the original framework to include the whole chain of regulatory agents. Following this, we investigate certification as a regulatory chain of practice in which external certification bureaus and their accreditation (regulatory) authority, together with work environment actors at local workplaces, create the frame for the conceptualisation of psychosocial risks and of the knowledge and evidence on which the regulation of audits is based. First, we identify and analyse the role of the accreditation authority by exploring their interpretation of the standard and the possible challenges of including psychosocial risks in external audits. Second, we analyse how certification bodies themselves regulate, i.e. how they define, categorise and address psychosocial work environment issues at local workplaces. We conclude the paper by discussing the possibilities of a stronger inclusion of the psychosocial work environment in external audits and the needs for further research.[1]

## 2. Background

Today, OHSAS 18,001 is the dominating OHSM standard; it is de facto an international standard, and during the coming years, it is expected to be replaced by an ISO standard. It was based on the same principles as ISO 9000, and it requires organisations with a certificate to establish internal systems of management and control which are subsequently audited and certified by external auditing agents. The standard contains requirements for the establishment and monitoring of the management system, but it does not establish absolute requirements for the OHS performance, other than what is specified in the OHS policy of the particular company and is required by national legislation. The standard explicitly states that it does not include specific OHS criteria or detailed specifications (BSI, 2008).

The OHSAS 18,001 standard is based on the methodology known as PDCA (plan-do-check-act):

- *Planning* involves the establishment of the objectives and processes necessary to deliver results in accordance with the OHS policy of the organisation. Procedures for the ongoing hazard identification, risk assessment, and determination of necessary controls are key instruments.
- *Doing* refers to processes that are expected to ensure performance. The processes include, for instance, the setting up of a system ensuring management commitment, procedures to make personnel aware of OHS risks, procedures for internal communication, workers' participation in risk assessment and the documentation of OHS policies.
- *Checking* concerns monitoring and the measurement of processes against the OHS policy objectives, legal requirements, and reporting of results. It requires procedures to monitor and measure OHS performance, to record, investigate and analyse incidents of dealing with non-conformities and to secure follow-up actions in order to avoid recurrence.
- *Acting* signifies the follow-up actions required in order to continually improve OHS performance.

In principle, OHSAS 18,001 addresses all OHS risks, but as already indicated, it does not explicitly mention the psychosocial work environment. Only once in the glossary do we find a reference to 'mental conditions'. Here, ill health is defined as '[an] identifiable, adverse physical or mental condition arising from and/or made worse by a work activity and/work related situation' (BSI, 2008, p. 3). It must therefore be assumed that the regulation of the psychosocial work environment is covered by the general requirements for the creation, maintenance and monitoring of an OHS management system within the certified organisation. The standard also requires that the certified organisations comply with the national legislation, and as the psychosocial work environment is covered by EU framework directive 89/381, this issue is also covered by the national legislation in Denmark as well as in other countries in the EU.

The shortcomings of OHSAS 18,001 regarding psychosocial risks have recently been addressed by developing two new additions to the standard: PAS 1010 (British Standard Institute, 2011) and a Canadian standard (Canadian Standard Association, 2013). Both of these specify the particularities of psychosocial risks, while still following the OHSAS 18,001 understanding of how to manage the work environment (Hohnen et al., 2014; Jespersen and Hasle, 2017).

### 2.1. The value chain of the OHSM certification systems

Certified OHSM systems such as OHSAS 18,001 are tied into a value chain between the accreditation body (in Denmark DANAK[2]), the certification bureau and the certified organisation (Fig. 1). The accreditation body accredits a certification bureau to issue certificates. The bureau must fulfil a number of requirements established by international standards, and in Europe also by an EU-directive. These rules are subsequently implemented in the national legislation and form the basis of the national accreditation. By reviewing documents and audits, the accreditation body ensures that the certification bureau fulfils the requirements and issues an accreditation on the basis of this. It subsequently carries out regular assessments (audits) of whether or not the

---

[2] http://english.danak.dk/