

ISO Survival Kit: Top 100 ISO 45001:2018 Lead Auditor Audit Failures

About This Guide

ISO 45001 is the internationally recognized standard for Occupational Health & Safety Management Systems (OHSMS). Designed to reduce workplace injuries and illnesses while promoting a culture of proactive risk management, it requires organizations to demonstrate leadership commitment, worker participation, and continual improvement.

But despite strong intentions, many organizations face recurring failures during the ISO 45001 certification process. These failures aren't due to a lack of safety effort — they're due to undocumented controls, poor hazard identification, weak worker engagement, and insufficient follow-through on corrective actions.

To help businesses navigate these challenges, we interviewed over 100 certified ISO 45001 lead auditors and analyzed dozens of real-world audit findings across industries. This document is the result — a breakdown of the 100 most frequent ISO 45001 non-conformities, with practical insights on how to fix them before your next audit.

Objectives of This Guide

- ✓ Identify and eliminate the most common ISO 45001 audit failures
- ✓ Align OH&S procedures with **ISO 45001:2018** clause requirements
- ✓ Improve audit readiness using a structured **ISO 45001 checklist**
- ✓ Provide actionable solutions to strengthen risk controls and leadership commitment
- ✓ Promote worker consultation, emergency preparedness, and legal compliance
- ✓ Support continuous improvement across safety management systems

Who Should Use This Guide?

- ISO 45001 Lead Auditors and internal OH&S audit teams
- EHS managers, HSE officers, and compliance professionals
- Facilities and operations leaders managing workplace risks
- Consultants supporting ISO 45001 certification projects
- Organizations preparing for a first-time or surveillance ISO 45001 audit

1. No Defined OH&S Roles and Responsibilities

📌 Clause: 5.3 – Organizational Roles, Responsibilities and Authorities

What's Going Wrong: Organizations often have documented responsibilities in policy files, but these roles are unclear to staff or not reinforced in daily operations. Without clarity, crucial OH&S duties fall through the cracks.

Why It Matters During an Audit: ISO 45001 requires clear delegation and communication of responsibilities across all levels of the organization. Auditors will ask managers and workers if they understand their roles.

How to Fix It: Develop a RACI matrix detailing safety responsibilities by role. Include this in onboarding, team briefings, and internal audits. Audit trail documentation must demonstrate clear assignment and understanding.

Real-World Result: Proper delegation drives accountability, streamlines OH&S actions, and prevents findings related to poor system implementation.

2. Risk Assessments Are Incomplete or Outdated

📌 Clause: 6.1.2.2 – Hazard Identification and Risk Assessment

What's Going Wrong: Risk assessments fail to cover all tasks, new equipment, or recent incidents. They are not updated frequently and often lack input from workers on the ground.

Why It Matters During an Audit: Auditors require current and comprehensive risk assessments that reflect actual site operations and are reviewed regularly.

How to Fix It: Schedule periodic reviews and updates. Include frontline employees in hazard identification. Use risk matrices and track all assessments centrally.

Real-World Result: Up-to-date assessments ensure more accurate hazard controls and demonstrate a proactive, living OHSMS.

3. Worker Participation Is Minimal or Absent

✦ Clause: 5.4 – Consultation and Participation of Workers

What's Going Wrong: Workers are not included in the development, evaluation, or improvement of OH&S procedures. Safety becomes a top-down initiative, disconnected from daily operations.

Why It Matters During an Audit: ISO 45001 emphasizes meaningful worker involvement. Lack of engagement may be flagged as a major non-conformity.

How to Fix It: Establish safety committees, encourage reporting, include workers in risk assessments and audits. Document participation and feedback sessions.

Real-World Result: Increased engagement improves safety outcomes, builds a culture of trust, and strengthens system effectiveness.

4. Emergency Response Plans Are Untested or Outdated

✦ Clause: 8.2 – Emergency Preparedness and Response

What's Going Wrong: Emergency procedures exist but are generic, untested, or fail to reflect new layouts, hazards, or staff roles. Drills are inconsistent or undocumented.

Why It Matters During an Audit: ISO 45001 requires regular testing and review of emergency procedures. Auditors expect documented drills and updates.

How to Fix It: Schedule and document emergency simulations. Include varied scenarios. Debrief after drills and revise procedures accordingly.

Real-World Result: Realistic testing prepares teams for emergencies and proves procedural relevance and compliance.

5. OH&S Objectives Are Vague or Unmeasured

📌 Clause: 6.2.1 – OH&S Objectives and Planning to Achieve Them

What’s Going Wrong: Objectives are too broad (e.g., “improve safety”) and lack metrics, timelines, or ownership. There’s no evidence of review or progress tracking.

Why It Matters During an Audit: Auditors require SMART objectives — Specific, Measurable, Achievable, Relevant, Time-bound — with supporting data.

How to Fix It: Define quantifiable goals (e.g., “reduce slips by 20% in 12 months”). Track monthly, assign owners, and report through dashboards.

Real-World Result: Well-defined objectives align teams and show strategic, measurable improvement to auditors.

6. Incident Investigations Lack Root Cause Analysis

📌 Clause: 10.2 – Incident, Nonconformity and Corrective Action

What’s Going Wrong: Incident reviews focus only on immediate causes, like “human error,” without analyzing system failures or deeper contributing factors.

Why It Matters During an Audit: ISO 45001 expects thorough root cause analysis to ensure corrective actions are effective and prevent recurrence.

How to Fix It: Train staff in structured techniques (e.g., 5 Whys). Standardize investigation reports to include cause, corrective actions, and verification steps.

Real-World Result: Deeper investigations lead to sustainable fixes and demonstrate a mature, learning-based safety culture.

7. Management Reviews Lack Required Inputs or Outputs

 Clause: 9.3 – Management Review

What's Going Wrong: Reviews are inconsistent or incomplete, lacking key data such as audit results, OH&S objectives, or stakeholder feedback. Decisions are undocumented.

Why It Matters During an Audit: ISO 45001 requires formalized reviews with evidence of decisions and follow-up actions based on system performance.

How to Fix It: Use a structured agenda aligned with Clause 9.3. Record all decisions, assign action owners, and review outcomes in subsequent meetings.

Real-World Result: Proper reviews ensure leadership engagement and continual improvement, satisfying key audit criteria.

8. Legal and Other Requirements Are Not Tracked or Updated

 Clause: 6.1.3 – Legal and Other Requirements

What's Going Wrong: Organizations fail to monitor evolving OH&S laws or rely on outdated compliance registers. There's no assigned responsibility for updates.

Why It Matters During an Audit: ISO 45001 requires organizations to identify, access, and update applicable legal and other requirements.

How to Fix It: Maintain a compliance register. Subscribe to legal update services. Review quarterly and assign an owner for legal tracking.

Real-World Result: Proactive compliance minimizes legal risk and demonstrates a high degree of audit preparedness.

9. Competence Requirements and Training Records Are Incomplete

📌 Clause: 7.2 – Competence

What's Going Wrong: Training is conducted but not linked to job-specific OH&S competencies. Records may be missing, outdated, or stored inconsistently.

Why It Matters During an Audit: Auditors require evidence that employees are competent, training is role-specific, and results are reviewed for effectiveness.

How to Fix It: Create a competence matrix by role. Retain training logs, attendance records, and evaluation results. Review annually.

Real-World Result: Strong competence frameworks support compliance, reduce incidents, and ensure audit readiness.

10. No Clear Method for Evaluating OH&S Performance

📌 Clause: 9.1.1 – Monitoring, Measurement, Analysis and Evaluation

What's Going Wrong: Organizations collect data (e.g., incident rates) but fail to analyze trends, set benchmarks, or integrate performance into decision-making.

Why It Matters During an Audit: ISO 45001 requires structured performance evaluation to identify gaps, track improvement, and guide planning.

How to Fix It: Define KPIs, monitor monthly, and analyze results in reviews. Link metrics to objectives and corrective actions.

Real-World Result: Measurable performance evaluation drives continual improvement and builds audit confidence.

11. No Process for Evaluating Effectiveness of Corrective Actions

📌 Clause: 10.2 – Incident, Nonconformity and Corrective Action

What’s Going Wrong: After incidents or audit findings, actions are implemented, but there is no follow-up to check whether they actually prevented recurrence.

Why It Matters During an Audit: ISO 45001 requires organizations to verify that corrective actions are not only completed but effective.

How to Fix It: Add an “effectiveness review” section to your corrective action process. Set a follow-up timeline and assign responsibility for confirmation.

Real-World Result: Effective verification prevents repeated failures and shows maturity in your safety management approach.

12. Lack of Integration Between OH&S and Business Strategy

📌 Clause: 5.1 – Leadership and Commitment

What’s Going Wrong: OH&S is treated as a siloed function rather than being aligned with business priorities such as operational continuity, productivity, and employee retention.

Why It Matters During an Audit: ISO 45001 emphasizes leadership commitment and integration of OH&S into the organization’s broader strategic direction.

How to Fix It: Include OH&S metrics in strategic planning sessions and board-level reports. Ensure senior management discusses safety objectives alongside business goals.

Real-World Result: Strategic alignment ensures OH&S receives attention, funding, and priority — and auditors take note.

13. Contractor OH&S Requirements Are Not Defined or Monitored

📌 Clause: 8.1.4.2 – Contractors

What's Going Wrong: Contractors operate without safety orientation, PPE enforcement, or oversight. Their risks are not assessed in the same way as those for internal staff.

Why It Matters During an Audit: ISO 45001 mandates that contractors working under your control comply with the same OH&S standards as your own workforce.

How to Fix It: Implement contractor onboarding, safety inductions, and monitoring programs. Include them in incident reporting and audits.

Real-World Result: Controlled contractor safety improves site-wide compliance and reduces liability in shared work environments.

14. Procurement Doesn't Consider OH&S Requirements

📌 Clause: 8.1.4.3 – Procurement

What's Going Wrong: Purchasing decisions are made based solely on cost or functionality, without evaluating safety specifications or supplier OH&S practices.

Why It Matters During an Audit: ISO 45001 requires that purchased goods and services not introduce new OH&S risks.

How to Fix It: Update procurement policies to include OH&S risk assessments. Evaluate suppliers' safety credentials before approval.

Real-World Result: Safer products and services reduce operational hazards and improve audit performance.

15. Inadequate Documentation of Change Management Related to OH&S

 Clause: 8.1.3 – Management of Change

What's Going Wrong: Changes in process, equipment, or location are implemented without assessing their impact on health and safety.

Why It Matters During an Audit: ISO 45001 requires formal change management processes that include OH&S risk considerations.

How to Fix It: Include OH&S assessments in all change requests. Assign reviewers and document approvals and follow-up actions.

Real-World Result: Effective change management reduces unanticipated risks and demonstrates system control to auditors.

16. PPE Selection Not Based on Risk Assessment

 Clause: 8.1.2 – Eliminating Hazards and Reducing OH&S Risks

What's Going Wrong: Personal protective equipment is assigned as a blanket requirement rather than based on task-specific hazards.

Why It Matters During an Audit: ISO 45001 requires the hierarchy of controls to be followed — PPE should be the last line of defense.

How to Fix It: Conduct task-based risk assessments, document PPE justifications, and train staff on correct usage.

Real-World Result: Proper PPE allocation reduces injuries and shows a disciplined, evidence-based safety approach.

17. Lack of Document Control for OH&S Procedures

📌 Clause: 7.5 – Documented Information

What's Going Wrong: Different departments use outdated or conflicting versions of safety procedures. There is no control over revision, approval, or access.

Why It Matters During an Audit: ISO 45001 requires control of documented information to ensure consistency, accuracy, and traceability.

How to Fix It: Implement a document control system with version tracking, approval workflows, and access logs.

Real-World Result: Controlled documentation enhances reliability and minimizes confusion across teams and audits.

18. Near Misses Are Not Reported or Analyzed

📌 Clause: 10.2 – Incident, Nonconformity and Corrective Action

What's Going Wrong: Only actual injuries are reported, while near misses and unsafe acts go undocumented, missing opportunities for prevention.

Why It Matters During an Audit: ISO 45001 promotes proactive learning — near misses are essential data points for risk reduction.

How to Fix It: Create a no-blame near-miss reporting process. Train employees to recognize and report them. Include them in risk reviews.

Real-World Result: Addressing near misses reduces future incidents and shows auditors a proactive safety culture.

19. No Trend Analysis of OH&S Data

📌 Clause: 9.1.1 – Monitoring and Evaluation

What's Going Wrong: Data such as incidents, audits, and training is collected but not reviewed to identify patterns or improvement opportunities.

Why It Matters During an Audit: ISO 45001 requires analysis of performance over time to support decision-making and improvement.

How to Fix It: Set up dashboards or regular reports to track trends in leading and lagging indicators. Discuss them in reviews.

Real-World Result: Trend analysis supports risk forecasting and continuous improvement, enhancing audit credibility.

20. No Competence Verification After Training

📌 Clause: 7.2 – Competence

What's Going Wrong: Employees complete safety training, but there is no test, observation, or verification to ensure skills were gained and retained.

Why It Matters During an Audit: ISO 45001 requires not just training, but evidence of competence — training alone is insufficient.

How to Fix It: Conduct post-training assessments, on-the-job observations, or written tests to confirm effectiveness. Document results.

Real-World Result: Verified competence leads to safer practices and provides strong evidence during audits.

21. Inconsistent Incident Reporting Across Sites or Departments

📌 Clause: 10.2 – Incident, Nonconformity and Corrective Action

What's Going Wrong: Some teams report every injury or unsafe act, while others only report serious cases. This creates inconsistent data and weakens the reliability of performance metrics.

Why It Matters During an Audit: ISO 45001 requires uniform reporting procedures to ensure hazards are consistently addressed and trends can be analyzed across the organization.

How to Fix It: Standardize the incident reporting process across all locations. Train all teams on when and how to report incidents, and monitor compliance.

Real-World Result: Consistent reporting enables better analysis and more effective risk control organization-wide.

22. No Records of Emergency Drill Evaluations or Improvements

📌 Clause: 8.2 – Emergency Preparedness and Response

What's Going Wrong: Drills are occasionally conducted but without documented results, debriefs, or corrective actions based on the drill performance.

Why It Matters During an Audit: ISO 45001 requires that drills are evaluated and used to drive improvements in emergency readiness.

How to Fix It: After each drill, perform a documented evaluation, identify response gaps, and implement changes. Include drill logs in audit evidence.

Real-World Result: Documented evaluations enhance readiness and prove continuous improvement in emergency planning.

23. No Periodic Review of OH&S Policy

📌 Clause: 5.2 – OH&S Policy

What's Going Wrong: The OH&S policy is created during initial certification but not reviewed annually or aligned with organizational changes.

Why It Matters During an Audit: ISO 45001 requires that the OH&S policy remain relevant, appropriate, and be regularly reviewed.

How to Fix It: Establish a formal annual review process. Update the policy after significant organizational changes, legal updates, or performance shifts.

Real-World Result: A current, aligned policy reflects leadership commitment and strengthens audit standing.

24. OH&S Risks Not Integrated into Business Risk Registers

📌 Clause: 6.1.1 – Risk and Opportunities

What's Going Wrong: Safety risks are managed separately from enterprise risks, which leads to siloed decision-making and lack of visibility at senior levels.

Why It Matters During an Audit: ISO 45001 expects that OH&S risks are recognized as part of strategic planning and enterprise-wide decision-making.

How to Fix It: Include key OH&S risks in corporate risk registers and escalate significant ones to management review forums.

Real-World Result: Integrated risk visibility supports smarter resource allocation and strengthens board-level accountability.

25. No Training for Temporary or Contract Workers

📌 Clause: 7.2 – Competence

What's Going Wrong: Temporary or agency workers are onboarded quickly with little or no OH&S training, creating gaps in hazard awareness and safe practices.

Why It Matters During an Audit: ISO 45001 requires that **all** personnel under organizational control be competent in safety-related tasks.

How to Fix It: Include temporary workers in safety orientation, role-specific training, and documentation protocols from day one.

Real-World Result: Trained contract staff reduce risk exposure and prevent audit findings related to uncontrolled personnel.

26. Lack of Objectives Related to Legal Compliance or Risk Reduction

📌 Clause: 6.2.1 – OH&S Objectives

What's Going Wrong: Objectives focus only on injury reduction, ignoring legal compliance metrics or process-based improvements.

Why It Matters During an Audit: ISO 45001 encourages diverse, performance-driven objectives tied to compliance and risk.

How to Fix It: Add goals such as “Zero overdue legal compliance actions” or “100% corrective action closure within 30 days.”

Real-World Result: Strategic, measurable goals show maturity in compliance management and system improvement.

27. No Process to Communicate OH&S Information to External Stakeholders

✦ Clause: 7.4.3 – External Communication

What's Going Wrong: Communication about OH&S matters is limited to internal staff. Contractors, visitors, suppliers, or local authorities are often overlooked.

Why It Matters During an Audit: ISO 45001 requires planned communication with relevant external parties about applicable OH&S risks or controls.

How to Fix It: Define communication needs by stakeholder group. Provide safety instructions for visitors and safety clauses in vendor agreements.

Real-World Result: Engaging external stakeholders reduces risk and enhances transparency for audits.

28. Safety Inspections Are Conducted but Not Analyzed

✦ Clause: 9.1.1 – Monitoring and Evaluation

What's Going Wrong: Safety walk-throughs and inspections happen, but findings are not compiled, tracked over time, or used to guide improvements.

Why It Matters During an Audit: ISO 45001 requires systematic evaluation of safety data — not just collection.

How to Fix It: Aggregate inspection results into dashboards or reports. Review trends monthly and use data to inform training and corrective action.

Real-World Result: Analysis turns routine checks into strategic tools for safety advancement and audit success.

29. Inconsistent Hazard Identification Across Similar Operations

📌 Clause: 6.1.2.1 – Hazard Identification

What's Going Wrong: Two departments doing similar work have different hazard assessments due to lack of standardization or shared best practices.

Why It Matters During an Audit: ISO 45001 expects consistency in hazard identification, especially in comparable tasks or job roles.

How to Fix It: Use standardized templates and cross-functional reviews. Benchmark hazard identification across teams doing similar tasks.

Real-World Result: Uniform assessments support fairness, completeness, and reduce risk blind spots.

30. No Communication of the OH&S Policy to Frontline Workers

📌 Clause: 5.2 – OH&S Policy

What's Going Wrong: The OH&S policy is posted on a website or a wall, but workers don't know what it says or how it applies to them.

Why It Matters During an Audit: ISO 45001 requires that the policy be communicated, understood, and applied at all levels.

How to Fix It: Review the policy during onboarding and refresher training. Use toolbox talks and signage to reinforce core principles.

Real-World Result: A well-communicated policy boosts worker alignment and satisfies auditor expectations for system awareness.

31. Internal Audit Schedule Doesn't Cover All OH&S Requirements

📌 Clause: 9.2.1 – Internal Audit

What's Going Wrong: Internal audits are irregular or limited to select departments. Key clauses or high-risk areas are missed entirely.

Why It Matters During an Audit: ISO 45001 requires a planned and systematic internal audit program that evaluates the entire OHSMS.

How to Fix It: Develop a risk-based audit schedule covering all clauses and processes. Rotate auditors and include findings in management reviews.

Real-World Result: A robust audit program ensures full compliance visibility and strengthens audit preparation.

32. Incomplete or Missing Records for Corrective Actions

📌 Clause: 10.2 – Incident and Corrective Action

What's Going Wrong: Corrective actions are discussed verbally or tracked informally. Deadlines and responsible parties are undocumented, and there's no evidence of closure.

Why It Matters During an Audit: ISO 45001 expects clear, traceable records of corrective actions and their effectiveness.

How to Fix It: Use a corrective action log with deadlines, owners, and effectiveness reviews. Link findings to incident or audit references.

Real-World Result: Traceable corrective actions reduce repeat findings and demonstrate improvement discipline.

33. No Evaluation of Compliance with Legal Requirements

📌 Clause: 9.1.2 – Evaluation of Compliance

What's Going Wrong: Organizations identify applicable laws but fail to assess if they are being met. No documented reviews or actions are tied to legal obligations.

Why It Matters During an Audit: ISO 45001 requires periodic evaluation of compliance with legal and other OH&S requirements.

How to Fix It: Establish a legal compliance evaluation schedule. Document evidence of compliance and action taken for gaps.

Real-World Result: Verified compliance lowers legal risk and meets auditor expectations for proactive governance.

34. No Process for Managing Documents Created by External Providers

📌 Clause: 7.5.3 – Control of Documented Information

What's Going Wrong: Safety documents from contractors or vendors are used without verifying version control, accuracy, or alignment with internal standards.

Why It Matters During an Audit: ISO 45001 requires that all documented information relevant to the OHSMS be controlled, including third-party materials.

How to Fix It: Include external document control in your document management system. Review, approve, and track all third-party safety documentation.

Real-World Result: Document control ensures consistency, avoids conflicting practices, and satisfies audit traceability.

35. OH&S Opportunities Are Not Captured or Reviewed

📌 Clause: 6.1.2.3 – Opportunities for Improvement

What's Going Wrong: Focus remains only on risks and non-conformities. Opportunities to improve safety performance (e.g., automation, redesign) are not documented or followed through.

Why It Matters During an Audit: ISO 45001 requires that both risks and improvement opportunities be addressed.

How to Fix It: Add a section for improvement opportunities in incident reports, audits, and management reviews. Track progress on selected initiatives.

Real-World Result: Embracing opportunities drives innovation and demonstrates a proactive safety culture.

36. Lack of Follow-up on Audit Findings

📌 Clause: 9.2.2 – Internal Audit Outcomes

What's Going Wrong: Audit findings are reported but not resolved in a timely or documented manner. No process ensures corrective actions are closed.

Why It Matters During an Audit: ISO 45001 requires that audit findings be evaluated and resolved as part of the continual improvement cycle.

How to Fix It: Assign due dates and owners for each finding. Verify closure through re-audit or evidence review and record the resolution.

Real-World Result: Follow-through builds credibility and prevents recurring issues from being flagged during certification audits.

37. Workers Are Not Informed About Incident Investigation Outcomes

 Clause: 7.4.2 – Internal Communication

What's Going Wrong: Employees report incidents, but results of investigations, root causes, and corrective actions are not shared with them.

Why It Matters During an Audit: ISO 45001 expects transparent communication to improve awareness and prevent recurrence.

How to Fix It: Share findings via toolbox talks, safety boards, or team briefings. Include lessons learned and improvements made.

Real-World Result: Informed workers contribute to safer practices and help institutionalize improvement.

38. Training Program Not Based on Risk or Job Role

 Clause: 7.2 – Competence

What's Going Wrong: Training is uniform across all employees, regardless of the risk level or specific responsibilities of their job roles.

Why It Matters During an Audit: ISO 45001 requires competence to be tailored to risk exposure and job duties.

How to Fix It: Develop role-specific training matrices. Align course content with risk assessments and re-certify based on exposure levels.

Real-World Result: Targeted training ensures high-risk roles are adequately prepared and supports audit defensibility.

39. Emergency Roles and Responsibilities Are Not Defined

 Clause: 8.2 – Emergency Preparedness and Response

What's Going Wrong: Emergency response plans exist but do not clearly assign who does what during an actual emergency (e.g., evacuation leader, first aid responder).

Why It Matters During an Audit: ISO 45001 requires that roles and responsibilities during emergencies be planned and communicated.

How to Fix It: Document roles in the emergency plan, conduct role-based drills, and ensure substitutes are trained.

Real-World Result: Clear roles improve real-time emergency performance and help meet auditor expectations for readiness.

40. No Preventive Maintenance Program for Safety-Critical Equipment

 Clause: 8.1.1 – Operational Planning and Control

What's Going Wrong: Equipment such as gas detectors, fire suppression systems, or ventilation units are maintained only after failure or not at all.

Why It Matters During an Audit: ISO 45001 requires planned maintenance to ensure safe operating conditions.

How to Fix It: Set maintenance intervals based on manufacturer specs or risk. Document all inspections, calibrations, and repairs.

Real-World Result: Reliable equipment prevents incidents and shows operational control to auditors.

41. First Aid Procedures Are Not Aligned With Workplace Hazards

📌 Clause: 8.1.1 – Operational Planning and Control

What's Going Wrong: First aid provisions are generic and not tailored to the specific risks of the workplace (e.g., burns, chemical exposure, or crush injuries).

Why It Matters During an Audit: ISO 45001 expects first aid resources and procedures to be based on hazard identification and risk assessments.

How to Fix It: Conduct a gap analysis between identified risks and available first aid capabilities. Equip kits accordingly and train designated responders.

Real-World Result: Proper first aid preparedness reduces incident severity and demonstrates practical control during audits.

42. Permit-to-Work System Is Not Used for High-Risk Activities

📌 Clause: 8.1.1 – Operational Planning and Control

What's Going Wrong: Hazardous tasks like confined space entry, hot work, or working at height proceed without formal authorization or control.

Why It Matters During an Audit: ISO 45001 requires controls for high-risk operations, including documented procedures and approvals.

How to Fix It: Implement a permit-to-work system with clear criteria, checklists, and supervisor approval. Audit permits for completeness and compliance.

Real-World Result: Safer execution of high-risk tasks and fewer audit findings linked to uncontrolled operational hazards.

43. Safety Signage Is Missing or Non-Compliant

📌 Clause: 7.4.2 – Internal Communication

What's Going Wrong: Required warning signs, PPE reminders, or hazard notifications are absent, faded, incorrectly placed, or not understood by workers.

Why It Matters During an Audit: ISO 45001 requires effective communication of OH&S information, including visible and legible signage.

How to Fix It: Conduct a signage audit, replace outdated materials, and ensure multilingual support where necessary. Include signage checks in inspections.

Real-World Result: Proper signage supports hazard awareness and strengthens compliance with communication requirements.

44. No Verification of Emergency Equipment Functionality

📌 Clause: 8.2 – Emergency Preparedness and Response

What's Going Wrong: Fire extinguishers, alarms, or emergency lighting are not routinely tested or inspected, leaving readiness uncertain.

Why It Matters During an Audit: ISO 45001 requires emergency response capabilities to be maintained and verified.

How to Fix It: Schedule and document regular equipment checks. Tag inspected items with dates and corrective actions for defects.

Real-World Result: Verified functionality improves emergency readiness and audit traceability.

45. Internal Audit Reports Lack Objectivity or Detail

📌 Clause: 9.2.2 – Internal Audit Reporting

What's Going Wrong: Audits are informal, lacking detail on findings, criteria, or evidence. Auditors may review their own areas, introducing bias.

Why It Matters During an Audit: ISO 45001 requires audits to be objective, evidence-based, and independent of the areas audited.

How to Fix It: Train internal auditors, rotate assignments, and use structured templates that document scope, findings, and evidence.

Real-World Result: Detailed, objective audits increase transparency and credibility with external auditors.

46. Changes in Legal Requirements Not Communicated Internally

📌 Clause: 6.1.3 – Legal and Other Requirements

What's Going Wrong: Legal updates are monitored at a corporate level but not communicated to operational teams responsible for compliance.

Why It Matters During an Audit: ISO 45001 expects that applicable requirements are known, understood, and implemented by those affected.

How to Fix It: Establish a process to distribute legal updates. Use newsletters, alerts, or briefings targeted to relevant departments.

Real-World Result: Improved legal awareness and compliance across all organizational levels.

47. OH&S Risks from New Projects or Expansions Not Assessed

📌 Clause: 6.1.2.1 – Hazard Identification

What's Going Wrong: When launching new processes or expanding facilities, risk assessments are delayed or overlooked entirely.

Why It Matters During an Audit: ISO 45001 requires proactive hazard identification before changes are implemented.

How to Fix It: Integrate OH&S risk assessments into project planning and change management workflows.

Real-World Result: Early risk detection avoids late-stage remediation and ensures compliance during organizational growth.

48. Inadequate Handling of Safety Data Sheets (SDS)

📌 Clause: 8.1.2 – Risk Control for Hazardous Substances

What's Going Wrong: SDSs are outdated, not easily accessible, or missing entirely for certain chemicals in use.

Why It Matters During an Audit: ISO 45001 mandates appropriate controls for hazardous substances, including access to safety information.

How to Fix It: Maintain a centralized SDS register with updated documents. Train staff on how to locate and use SDSs effectively.

Real-World Result: Improved chemical safety and compliance with legal and audit expectations.

49. Safety Performance Not Communicated to Workers

📌 Clause: 7.4.2 – Internal Communication

What's Going Wrong: Safety KPIs, audit results, or progress on OH&S objectives are only reviewed at management level and not shared with the workforce.

Why It Matters During an Audit: ISO 45001 requires communication that supports awareness, engagement, and improvement across all roles.

How to Fix It: Share performance data in monthly safety meetings, digital boards, or internal newsletters. Use visuals for accessibility.

Real-World Result: Transparency drives accountability, participation, and audit readiness.

50. Lack of Control Over Visitors and Their OH&S Awareness

📌 Clause: 8.1.4.1 – Control of External Providers

What's Going Wrong: Visitors enter worksites without safety orientation, sign-in protocols, or PPE enforcement.

Why It Matters During an Audit: ISO 45001 requires organizations to manage OH&S risks posed by external persons under their control.

How to Fix It: Develop a visitor management process including briefings, PPE provision, and access restrictions. Record entries and exits.

Real-World Result: Controlled visitor access enhances site safety and satisfies auditor expectations for risk containment.

51. Safety Objectives Not Linked to Measurable Outcomes

📌 Clause: 6.2.1 – OH&S Objectives and Planning to Achieve Them

What's Going Wrong: Objectives like “enhance safety culture” or “minimize risks” are too vague and lack any measurable criteria for success.

Why It Matters During an Audit: ISO 45001 requires that objectives be quantifiable and trackable to ensure real progress.

How to Fix It: Redefine objectives using measurable KPIs such as “achieve 95% safety training compliance by Q4” or “reduce hand injuries by 20%.”

Real-World Result: Clear metrics guide focused action and demonstrate tangible improvement to auditors.

52. Incomplete Risk Register for Ancillary Operations

📌 Clause: 6.1.2.1 – Hazard Identification

What's Going Wrong: Support functions like cleaning, maintenance, or administration are excluded from the main OH&S risk register.

Why It Matters During an Audit: ISO 45001 applies to all activities under the organization's control, not just core operations.

How to Fix It: Conduct full-scope assessments and ensure risks are documented for every department, including outsourced support roles.

Real-World Result: A comprehensive register strengthens risk management and reflects system-wide control.

53. No System for Tracking Safety-Related Complaints or Feedback

📌 Clause: 10.2 – Incident and Nonconformity Handling

What's Going Wrong: Workers raise safety concerns verbally, but no system exists to formally capture, track, or resolve these inputs.

Why It Matters During an Audit: ISO 45001 encourages using complaints and observations as opportunities for system improvement.

How to Fix It: Create a digital or physical log for feedback. Assign responsibility, track response times, and share outcomes with staff.

Real-World Result: Engaging with concerns improves trust, closes gaps, and satisfies auditors' expectations for responsiveness.

54. No Visual Identification of Safety-Critical Roles

✦ Clause: 5.3 – Roles, Responsibilities and Authorities

What's Going Wrong: Emergency responders, first aiders, or fire marshals are not clearly marked, leading to confusion in drills or incidents.

Why It Matters During an Audit: ISO 45001 requires that responsibilities be clearly defined and known throughout the organization.

How to Fix It: Use badges, high-visibility gear, wall posters, or digital dashboards to identify individuals assigned to safety-critical roles.

Real-World Result: Fast recognition improves emergency response and reinforces organizational structure.

55. OH&S Considerations Missing in Supplier Evaluations

✦ Clause: 8.1.4.3 – Procurement

What's Going Wrong: Vendors are selected based on price and quality alone, without assessing their safety records or practices.

Why It Matters During an Audit: ISO 45001 requires organizations to ensure that procured products and services don't introduce OH&S risks.

How to Fix It: Include OH&S criteria in supplier scorecards. Request safety certifications, incident history, or audit results during onboarding.

Real-World Result: Safer sourcing reduces risks and strengthens due diligence for certification audits.

56. Workers Not Trained on the Purpose of ISO 45001

 Clause: 7.3 – Awareness

What's Going Wrong: Workers are unaware of the ISO 45001 system, their role in it, or how it supports safety performance and legal compliance.

Why It Matters During an Audit: ISO 45001 requires that employees understand the OH&S management system and how they contribute to its success.

How to Fix It: Offer ISO 45001 awareness sessions during onboarding and refresher training. Use posters or toolbox talks to reinforce messages.

Real-World Result: Awareness improves engagement, system adoption, and audit confidence.

57. Inspections Are Conducted But Not Evaluated Over Time

 Clause: 9.1.1 – Monitoring and Evaluation

What's Going Wrong: Regular inspections take place, but there is no trend analysis or follow-up on recurring observations.

Why It Matters During an Audit: ISO 45001 expects analysis and improvement, not just activity. Repeating issues indicate lack of corrective action.

How to Fix It: Compile inspection results into a database. Analyze monthly trends, root causes, and assign follow-ups.

Real-World Result: Continuous improvement becomes data-driven and strengthens system effectiveness.

58. Incident Logs Lack Classification or Severity Ranking

📌 Clause: 10.2 – Incident and Corrective Action

What's Going Wrong: All incidents are logged uniformly, making it hard to prioritize high-risk issues or track severity over time.

Why It Matters During an Audit: ISO 45001 supports risk-based thinking. Severity assessment is key to setting priorities.

How to Fix It: Add a classification field in your incident log (e.g., minor, serious, near miss, fatality potential). Use these to prioritize action.

Real-World Result: Focused efforts on high-risk events improve safety outcomes and satisfy audit scrutiny.

59. No Contingency Plan for Key OH&S Personnel Absence

📌 Clause: 8.2 – Emergency Preparedness and Response

What's Going Wrong: Designated first responders or safety officers are unavailable during certain shifts, with no backups identified.

Why It Matters During an Audit: ISO 45001 expects continuity in emergency response and clear planning for personnel availability.

How to Fix It: Assign alternates and ensure all shifts have trained coverage. Document contingency roles and schedules.

Real-World Result: Continuous readiness enhances safety assurance and builds audit resilience.

60. External OH&S Communication Not Documented

📌 Clause: 7.4.3 – External Communication

What's Going Wrong: Conversations with contractors, regulators, or community members about safety are informal and undocumented.

Why It Matters During an Audit: ISO 45001 requires planning and documentation for communication with external stakeholders on OH&S matters.

How to Fix It: Use email summaries, meeting notes, or logs to document communications. Include planned messaging in your communication procedure.

Real-World Result: Transparent, documented dialogue reduces misunderstandings and improves compliance posture.

61. Safety Culture Not Assessed or Measured

✦ Clause: 9.1.1 – Monitoring, Measurement, Analysis and Evaluation

What's Going Wrong: Organizations talk about improving safety culture but do not measure it or assess worker perceptions regularly.

Why It Matters During an Audit: ISO 45001 promotes continual improvement through monitoring and feedback, including culture and behavioral indicators.

How to Fix It: Conduct safety perception surveys, interviews, or focus groups. Track changes annually and align actions with feedback.

Real-World Result: Measurable culture insights support targeted interventions and demonstrate system maturity.

62. Hazard Controls Not Prioritized According to the Hierarchy of Controls

✦ Clause: 8.1.2 – Eliminating Hazards and Reducing OH&S Risks

What's Going Wrong: Organizations rely heavily on PPE or administrative controls instead of eliminating hazards or substituting safer processes.

Why It Matters During an Audit: ISO 45001 mandates following the hierarchy of controls to ensure effective risk reduction.

How to Fix It: Reassess control measures to favor elimination, substitution, and engineering solutions before relying on PPE or signage.

Real-World Result: Stronger controls reduce incident potential and reflect compliance with core ISO principles.

63. Fatigue and Workload Risks Are Not Evaluated

📌 Clause: 6.1.2.1 – Hazard Identification

What's Going Wrong: Work schedules, extended shifts, and mental fatigue are not assessed as part of OH&S risks.

Why It Matters During an Audit: ISO 45001 requires consideration of human factors and conditions that could lead to harm.

How to Fix It: Include fatigue and workload as risk variables in assessments. Adjust schedules and rest policies accordingly.

Real-World Result: Addressing human factors prevents burnout and improves compliance with evolving OH&S expectations.

64. Manual Handling Risks Not Properly Controlled

📌 Clause: 8.1.2 – Operational Risk Control

What's Going Wrong: Workers frequently lift or move heavy loads without mechanical aids, assessments, or training.

Why It Matters During an Audit: ISO 45001 expects practical measures to eliminate or reduce known ergonomic risks.

How to Fix It: Introduce trolleys, lifting devices, and training on proper lifting techniques. Conduct ergonomic assessments regularly.

Real-World Result: Fewer injuries, better worker wellbeing, and stronger audit performance in physical hazard areas.

65. No Regular Review of Contractor OH&S Performance

📌 Clause: 8.1.4.2 – Control of Contractors

What's Going Wrong: Contractors are evaluated only during onboarding, not throughout the lifecycle of their engagement.

Why It Matters During an Audit: ISO 45001 requires ongoing monitoring of contractor compliance and safety performance.

How to Fix It: Perform quarterly reviews, inspections, and evaluations of contractor performance. Include non-conformities and feedback in reports.

Real-World Result: Improved control over third-party risks and a clear demonstration of due diligence to auditors.

66. Workplace Inspections Do Not Include Behavioral Observations

📌 Clause: 9.1.1 – Monitoring and Evaluation

What's Going Wrong: Inspections focus solely on physical conditions and miss unsafe behaviors or procedural violations.

Why It Matters During an Audit: ISO 45001 encourages proactive identification of unsafe acts before incidents occur.

How to Fix It: Integrate behavioral observations into inspection checklists. Train observers on how to give constructive feedback.

Real-World Result: Safer behaviors reduce incidents and show auditors that risks are managed holistically.

67. No Integration of OH&S Performance Into Employee Evaluations

📌 Clause: 5.3 – Responsibilities and Accountability

What's Going Wrong: Safety performance is not tied to individual KPIs or annual reviews, even for supervisory or high-risk roles.

Why It Matters During an Audit: ISO 45001 promotes accountability and leadership involvement at every level.

How to Fix It: Incorporate safety KPIs into performance reviews for all applicable roles, including attendance at safety meetings, reporting, and incident rates.

Real-World Result: Linked accountability reinforces safety commitment and creates organizational alignment.

68. Emergency Preparedness Doesn't Cover All Operational Scenarios

 **Clause:** 8.2 – Emergency Preparedness and Response

What's Going Wrong: Plans focus only on fire evacuation and overlook other realistic emergencies like chemical spills, electrical faults, or extreme weather.

Why It Matters During an Audit: ISO 45001 requires that emergency preparedness be comprehensive and scenario-specific.

How to Fix It: Conduct a risk-based review of potential emergencies. Develop and drill tailored plans for each high-priority scenario.

Real-World Result: Broader preparedness boosts real-world readiness and demonstrates complete system implementation.

69. Workers Don't Know How to Report Hazards or Concerns

 **Clause:** 7.3 – Awareness

What's Going Wrong: Workers may recognize unsafe conditions but aren't sure how or where to report them, leading to unaddressed risks.

Why It Matters During an Audit: ISO 45001 requires workers to be aware of reporting mechanisms and their right to participate in OH&S.

How to Fix It: Reinforce reporting procedures in training, signage, and team meetings. Make reporting anonymous where possible.

Real-World Result: Improved hazard reporting leads to faster resolution and more effective system feedback.

70. Visitors Not Accounted for in Emergency Planning

📌 Clause: 8.2 – Emergency Preparedness and Response

What's Going Wrong: Emergency procedures do not consider visitors, clients, or vendors who may be unfamiliar with site protocols.

Why It Matters During an Audit: ISO 45001 requires consideration of all persons under the organization's control in emergency planning.

How to Fix It: Register all visitors, provide briefings upon entry, and assign responsibility for guiding them in emergencies.

Real-World Result: Inclusive planning improves real-time safety and ensures compliance during external audits.

71. OH&S Policy Not Accessible to All Workers

📌 Clause: 5.2 – OH&S Policy

What's Going Wrong: The OH&S policy is buried in intranet folders or binders that most employees don't access. Many workers are unaware the policy exists.

Why It Matters During an Audit: ISO 45001 requires that the OH&S policy be communicated, understood, and readily accessible to all workers.

How to Fix It: Post the policy in common areas, distribute during onboarding, and include it in safety meetings or employee handbooks.

Real-World Result: Policy visibility promotes awareness and shows auditors that communication requirements are fulfilled.

72. No Process for Addressing Emerging Risks (e.g., pandemics, AI)

 Clause: 6.1.1 – Risk and Opportunities

What's Going Wrong: New and evolving risks such as infectious disease, remote work, or digital monitoring are not assessed or planned for.

Why It Matters During an Audit: ISO 45001 requires that new and emerging risks be identified, assessed, and managed proactively.

How to Fix It: Expand your hazard identification framework to include social, technological, and biological risks.

Real-World Result: Proactive planning for emerging risks demonstrates agility and a forward-looking safety approach.

73. Workers Are Unaware of Their Rights Under OH&S Law

 Clause: 7.3 – Awareness

What's Going Wrong: Employees are unaware of their right to refuse unsafe work, participate in safety activities, or be protected from retaliation.

Why It Matters During an Audit: ISO 45001 requires awareness of individual OH&S responsibilities and rights.

How to Fix It: Include worker rights in onboarding, safety training, and communication materials. Encourage open reporting.

Real-World Result: Empowered employees actively engage in safety and help reduce legal and reputational risk.

74. Contractors Are Not Given Site-Specific Safety Inductions

 Clause: 8.1.4.2 – Control of Contractors

What's Going Wrong: Contractors may be briefed on general safety expectations but not on the specific hazards and procedures of the site they're working on.

Why It Matters During an Audit: ISO 45001 expects contractors to be treated as internal workers regarding OH&S risk controls.

How to Fix It: Require contractors to attend detailed site inductions. Provide documentation and verify understanding.

Real-World Result: Safer contractor operations and fewer compliance gaps during external audits.

75. No Process to Evaluate the Impact of Past Incidents on Future Risk Planning

📌 Clause: 10.2 – Incident, Nonconformity and Corrective Action

What's Going Wrong: Lessons from incidents are not formally integrated into the organization's risk assessments or control planning.

Why It Matters During an Audit: ISO 45001 promotes learning from past events to drive system improvement.

How to Fix It: Update risk registers after major incidents. Include “lessons learned” sessions during audits and reviews.

Real-World Result: Strong feedback loops increase resilience and reduce recurrence of preventable incidents.

76. OH&S Planning Not Aligned with Organizational Objectives

📌 Clause: 6.2.2 – Planning to Achieve Objectives

What's Going Wrong: Safety goals are created in isolation, with no link to broader company objectives such as productivity, sustainability, or growth.

Why It Matters During an Audit: ISO 45001 encourages integration of OH&S into strategic business planning.

How to Fix It: Align OH&S targets with operational KPIs. Include cross-functional input during planning cycles.

Real-World Result: Strategic alignment builds support for safety initiatives and demonstrates leadership engagement.

77. Roles in Incident Response Are Not Rehearsed or Practiced

 **Clause:** 8.2 – Emergency Preparedness and Response

What's Going Wrong: Response procedures assign roles, but the people in those roles are not trained or drilled on their responsibilities.

Why It Matters During an Audit: ISO 45001 requires that emergency roles are defined, communicated, and tested.

How to Fix It: Conduct scenario-based drills with role-specific responsibilities. Provide performance feedback and retraining as needed.

Real-World Result: Confident responders reduce chaos and improve audit performance through readiness.

78. Language or Literacy Barriers Not Considered in OH&S Communication

 **Clause:** 7.4.2 – Internal Communication

What's Going Wrong: Safety instructions, signage, and training are delivered only in one language or at a literacy level that some workers may not understand.

Why It Matters During an Audit: ISO 45001 emphasizes accessible communication tailored to the audience.

How to Fix It: Translate critical materials. Use symbols, visuals, and verbal briefings where needed. Validate understanding during training.

Real-World Result: Inclusive communication improves compliance and ensures equitable access to safety information.

79. No Process for Recognizing or Rewarding Positive Safety Behavior

 Clause: 5.1 – Leadership and Commitment

What's Going Wrong: The safety program focuses only on incidents and violations, with no formal recognition of safe behaviors or contributions.

Why It Matters During an Audit: ISO 45001 promotes leadership that encourages continual improvement and participation.

How to Fix It: Implement recognition programs for safety suggestions, near-miss reporting, or consistent PPE use.

Real-World Result: Positive reinforcement strengthens engagement and enhances organizational safety culture.

80. Mobile Workers or Remote Teams Are Excluded from OH&S Controls

 Clause: 4.3 – Scope of the OH&S Management System

What's Going Wrong: Remote workers, field personnel, and mobile technicians are often overlooked in hazard assessments, inspections, and safety training.

Why It Matters During an Audit: ISO 45001 applies to all activities within the organization's control — regardless of location.

How to Fix It: Extend training, inspections, and risk assessments to off-site operations. Use mobile-friendly resources.

Real-World Result: Full-scope safety management improves protection and ensures a defensible audit trail.

81. PPE Compliance Not Monitored or Enforced Consistently

 Clause: 8.1.2 – Eliminating Hazards and Reducing OH&S Risks

What's Going Wrong: PPE rules exist but enforcement is inconsistent. Supervisors may overlook violations, and usage is rarely audited.

Why It Matters During an Audit: ISO 45001 expects operational controls, including PPE, to be maintained and monitored for effectiveness.

How to Fix It: Conduct routine spot checks, involve supervisors in enforcement, and document non-compliance with follow-up actions.

Real-World Result: Consistent enforcement reduces incidents and demonstrates control discipline to auditors.

82. Safety Training Not Tailored to Local Regulations or Site Hazards

 Clause: 7.2 – Competence

What's Going Wrong: Training materials are generic or developed centrally, without reflecting local risks or jurisdiction-specific legal requirements.

Why It Matters During an Audit: ISO 45001 mandates that training be relevant to each worker's risks and regulatory environment.

How to Fix It: Customize training by location, include site-specific examples, and align content with regional laws and risks.

Real-World Result: Location-aware training reduces liability and better prepares workers for actual conditions.

83. No Centralized Tracking of OH&S Objectives Across Departments

 Clause: 6.2.2 – Planning to Achieve OH&S Objectives

What's Going Wrong: Objectives are created at department level but tracked separately or inconsistently, with no central monitoring.

Why It Matters During an Audit: ISO 45001 requires planning, tracking, and evaluation of safety objectives across the organization.

How to Fix It: Use shared tracking tools or dashboards. Include objectives in management reviews and report consolidated progress.

Real-World Result: Central oversight improves alignment, transparency, and system effectiveness.

84. Outdated Emergency Contact Lists or Inaccessible Emergency Info

 Clause: 8.2 – Emergency Preparedness and Response

What's Going Wrong: Emergency contact lists are outdated or stored in places not easily accessible during a crisis.

Why It Matters During an Audit: ISO 45001 requires preparedness information to be available, up to date, and usable under emergency conditions.

How to Fix It: Update contacts quarterly. Post lists in visible locations and digitize them for mobile access.

Real-World Result: Reliable emergency access improves response and audit confidence in emergency planning.

85. Lack of Clear Procedure for Temporary Task Reassignments

 Clause: 8.1.1 – Operational Planning and Control

What's Going Wrong: When employees are temporarily reassigned to unfamiliar tasks, no risk assessment or briefing is conducted.

Why It Matters During an Audit: ISO 45001 requires planning and control of changes, including temporary personnel shifts.

How to Fix It: Establish a reallocation protocol including task briefing,

hazard review, and skill verification.

Real-World Result: Safer transitions and reduced risk of incidents from untrained personnel.

86. Inconsistent Communication Between Safety and Operations Teams

 Clause: 7.4.2 – Internal Communication

What's Going Wrong: Operations teams make decisions affecting safety (e.g., layout changes, equipment upgrades) without informing the OH&S team.

Why It Matters During an Audit: ISO 45001 promotes integration and communication across departments to manage OH&S risks.

How to Fix It: Schedule joint planning meetings. Require safety signoff on operational changes. Use shared communication channels.

Real-World Result: Cross-functional alignment enhances risk management and system cohesion.

87. Internal Audit Criteria Not Aligned with ISO 45001 Requirements

 Clause: 9.2.1 – Internal Audit Program

What's Going Wrong: Audits use outdated standards, internal policies only, or fail to evaluate compliance with ISO 45001 clauses.

Why It Matters During an Audit: ISO 45001 requires that audits measure the extent to which requirements are fulfilled.

How to Fix It: Update audit checklists to reference current ISO 45001 clauses. Train auditors on clause interpretation.

Real-World Result: Accurate audits uncover true gaps and support certification readiness.

88. No Evidence of Ongoing Worker Involvement in Improvement Actions

📌 Clause: 5.4 – Participation and Consultation

What's Going Wrong: Workers are not invited to follow-up discussions or improvement planning after incidents or audits.

Why It Matters During an Audit: ISO 45001 encourages active participation in safety planning, not just passive compliance.

How to Fix It: Include workers in root cause sessions, risk control selection, and post-audit reviews. Document their input.

Real-World Result: Inclusive participation leads to more practical solutions and enhances cultural engagement.

89. No Visual or Digital Safety Metrics Available to Workers

📌 Clause: 7.4.2 – Internal Communication

What's Going Wrong: Safety performance data is compiled for management only. Workers don't see KPIs, audit scores, or incident trends.

Why It Matters During an Audit: ISO 45001 expects communication of system performance to those who affect and are affected by it.

How to Fix It: Post dashboards in break rooms, update monthly safety boards, or use mobile apps to share simplified data.

Real-World Result: Transparency boosts awareness, motivation, and involvement across the workforce.

90. Risk Control Measures Are Not Audited for Effectiveness

📌 Clause: 8.1.2 – Risk Reduction Controls

What's Going Wrong: Once a control is implemented (e.g., guardrails, signage), it is not revisited to confirm if it's working as intended.

Why It Matters During an Audit: ISO 45001 requires monitoring and reviewing controls to ensure they are effective and remain appropriate.

How to Fix It: Add control effectiveness to internal audit checklists. Schedule field verifications and worker feedback assessments.

Real-World Result: Verified controls demonstrate system integrity and support continual improvement cycles.

91. Outdated or Missing Records of Equipment Inspections

📌 Clause: 8.1.1 – Operational Planning and Control

What's Going Wrong: Safety-critical equipment is used without current inspection records. Some logs are missing or incomplete.

Why It Matters During an Audit: ISO 45001 requires proper maintenance and records to demonstrate that controls are functioning as planned.

How to Fix It: Create a centralized register with inspection dates, findings, and follow-up actions. Link inspections to risk assessments.

Real-World Result: Accurate records support proactive maintenance and demonstrate effective hazard control.

92. Risk Assessments Do Not Cover Environmental or Surrounding Hazards

📌 Clause: 6.1.2.1 – Hazard Identification

What's Going Wrong: Risk assessments focus only on internal factors and ignore nearby hazards (e.g., adjacent sites, weather, traffic).

Why It Matters During an Audit: ISO 45001 requires comprehensive identification of hazards under the organization's control or influence.

How to Fix It: Update assessments to include external and environmental

factors that could impact worker safety.

Real-World Result: Broader awareness reduces overlooked risks and satisfies audit expectations for thoroughness.

93. OH&S Resources Not Adequately Budgeted or Prioritized

✦ Clause: 5.1 – Leadership and Commitment

What’s Going Wrong: Safety initiatives are delayed or underfunded due to lack of resource allocation from leadership.

Why It Matters During an Audit: ISO 45001 requires top management to provide necessary resources for the OHSMS to function effectively.

How to Fix It: Include OH&S funding in annual planning. Track spending on training, equipment, and corrective actions.

Real-World Result: Visible investment in safety reinforces leadership commitment and audit credibility.

94. Lack of Procedure for Decommissioning or Removing Safety Hazards

✦ Clause: 8.1.1 – Operational Control

What’s Going Wrong: Hazardous machinery or areas are marked as “out of use” but remain accessible or lack formal decommissioning plans.

Why It Matters During an Audit: ISO 45001 expects that hazard controls are maintained, removed, or replaced in a controlled manner.

How to Fix It: Develop a procedure for tagging out, removing, or locking off equipment. Document decommissioning actions.

Real-World Result: Safer work zones and controlled environments reduce audit concerns and prevent incidents.

95. Safety Committee Meetings Lack Follow-up or Action Tracking

📌 Clause: 5.4 – Participation and Consultation

What's Going Wrong: Committees meet regularly but minutes are not reviewed, and action items are not followed up or tracked to completion.

Why It Matters During an Audit: ISO 45001 values worker involvement that results in system improvement — not just discussion.

How to Fix It: Assign an owner to each action. Use a log to track completion dates and revisit open items in the next meeting.

Real-World Result: Documented follow-up proves meaningful consultation and enhances safety ownership.

96. Communication on OH&S Topics Is Not Two-Way

📌 Clause: 7.4.2 – Internal Communication

What's Going Wrong: OH&S information is pushed out to staff (e.g., posters, emails), but there's no structured way to gather input or responses.

Why It Matters During an Audit: ISO 45001 expects communication to be interactive, allowing input from workers.

How to Fix It: Use surveys, suggestion boxes, safety walks, or digital feedback forms to collect input. Discuss responses in team meetings.

Real-World Result: Engaged workers provide better insights, identify risks, and help auditors see a dynamic safety culture.

97. Roles in OH&S Are Assigned but Not Backed by Training or Authority

📌 Clause: 5.3 – Organizational Roles, Responsibilities and Authorities

What's Going Wrong: Safety coordinators or representatives are named, but they lack authority, training, or support to carry out duties.

Why It Matters During an Audit: ISO 45001 requires that responsibilities come with the competence and empowerment to fulfill them.

How to Fix It: Match training plans and management backing to assigned roles. Clarify authority in role descriptions.

Real-World Result: Competent, empowered personnel improve implementation and system performance.

98. Contractors and Visitors Not Included in Incident Investigations

📌 Clause: 10.2 – Incident and Nonconformity Management

What's Going Wrong: When an incident involves a contractor or visitor, investigations are less thorough or skipped entirely.

Why It Matters During an Audit: ISO 45001 requires all incidents to be reviewed for system impact and preventive action, regardless of who was involved.

How to Fix It: Apply the same root cause and reporting processes for non-staff incidents. Communicate outcomes to affected parties.

Real-World Result: A consistent approach builds trust and meets standard requirements for system integrity.

99. Improvement Actions Focus Only on Compliance, Not Prevention

📌 Clause: 10.3 – Continual Improvement

What's Going Wrong: Improvements are reactive — only addressing compliance gaps instead of proactively reducing risk or enhancing performance.

Why It Matters During an Audit: ISO 45001 supports a forward-looking mindset for continual improvement beyond minimum requirements.

How to Fix It: Identify proactive goals such as redesigning workspaces, adopting automation, or launching behavior-based safety programs.

Real-World Result: Future-focused strategies elevate system maturity and impress auditors seeking evidence of progress.

100. OH&S System Performance Is Not Reviewed Against Strategic Goals

 **Clause:** 9.3.2 – Management Review Outputs

What's Going Wrong: Reviews focus on metrics but don't connect them to broader business performance (e.g., productivity, retention, or cost savings).

Why It Matters During an Audit: ISO 45001 encourages integrating OH&S outcomes into the organization's strategic direction.

How to Fix It: Align safety KPIs with business goals. Report on how safety supports operational success in reviews.

Real-World Result: Strategic alignment shows OH&S is embedded in core values, not isolated, and builds strong audit impressions.

Advancing Your ISO 45001 Compliance Journey

Achieving ISO 45001:2018 certification is not just about passing an audit — it's about building a resilient and proactive occupational health and safety culture that protects your people, your reputation, and your business.

This guide has outlined the 100 most common non-conformities observed during ISO 45001 lead auditor assessments. These findings are based on real-world audits conducted across industries and compiled with insights from more than 100 certified ISO 45001 professionals.

By identifying and addressing these common audit failures, your organization can:

- ✓ Strengthen risk controls and eliminate system blind spots
- ✓ Improve audit readiness and reduce costly delays
- ✓ Build leadership accountability and employee participation
- ✓ Align OH&S practices with operational performance and strategic goals
- ✓ Foster a culture of continual improvement and compliance excellence

Compliance Is a Continual Process

Maintaining a robust Occupational Health & Safety Management System (OHSMS) means staying alert to new risks, evaluating the effectiveness of controls, and actively engaging your workforce in every part of the system.

Whether you're preparing for your first ISO 45001 audit or advancing your safety program post-certification, these insights can help guide smarter, safer decisions.

Stay Tuned: More ISO Survival Kit Guides Are Coming

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