Questions to consider when selecting compliance software (incl. WHSEQ)

Management Systems

.01

The three popular Management System Standards, ISO9001, ISO45001, ISO14001 have many mandatory requirements in common, viz.

- Document control
- Records management
- Corrective and preventive actions incl. incident reporting and investigation
- Control of operational processes incl. risk assessment and implementation of a hierarchy of controls
- Monitoring of processes
- Training, specifically tracking competency and skills to complete specific tasks and their controls is a common requirement.
- Performance statistics and analysis of the monitoring and measuring activities - reporting.

Software Selection Criteria

.02

As a buyer of a compliance management software solution, it would be worth asking how the software handles these mandatory requirements:

DOCUMENTS

- Approvals of new documents
- Version control
- Control of their distribution
  - Who should have access to the various docs
  - Read and acknowledge
- Document review dates
- Document register

RECORDS

- Storage and retrieval
- Backup and disaster recovery
- Disposal
- Control of who has access
- Records register

CONTROL OF OPERATIONAL PROCESSES

- Can the software cater for the diversity of operational processes that need to be controlled by the organisation?
  i.e. how much more that Incident / Injury / Hazard reporting can it handle?
- Can it ensure users only have access to the controls (i.e. checklists or inspection forms) they need to complete?
- Can the software determine if an operational control did not meet an acceptance criteria and trigger a follow on action?
- Given that these operational controls are essentially checklists or forms of some sort, how does the system handle changes in their contents e.g. changes to the sequence or changes to the wording of questions or additional or removal of questions etc. ?
- Can the system send alerts via email or SMS to key managers or staff in the event of specific types of events reported or based on their severity?

MANAGEMENT OF NON-CONFORMANCES OR INCIDENTS

- Can different types of non-conformances or incidents be reported differently?
  (e.g. client complaints vs. vehicle incident vs. on site injury)
- What rules / guidelines are used to assign corrective actions assigned to people and how are these corrective actions reported?
- How are open and overdue actions tracked?
- How are actions reviewed after close off to assess the effectiveness of the corrective or preventive action?
- How are non-conformances (or incidents) risk-rated?
- How can the system assist in determining whether the incident or non-conformance requires an investigation?
- What rules are used to assign investigations?
- How can one check that the investigations have been conducted and the status of any follow up corrective and preventive actions arising from the investigation?

MONITORING

- Can the system maintain a schedule of monitoring or control activities e.g. particular checks that need to be conducted by particular people such as weekly or monthly workplace inspections by the local Safety reps or nternal audits by the appointed internal auditors?
- Can the system send reminders **before** due dates?
- Can the system advise if an activity was missed?
- Can the system track performance against the schedule, can it handle a grace period e.g. 7 days to report statuses such as “completed on time”, “late but closed within grace period”, “completed late”, “currently overdue” etc.?

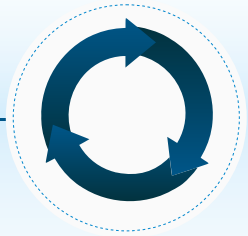
COMPETENCIES

- Can the system check whether a person is competent to carry out a check? (i.e. allowed to carry out a forklift pre-start check or conduct a racking inspection)

REPORTING

- Can the system categorise or classify events to make statistical analysis easier?
- Can the system score particular checks e.g. scores or pass-marks as %, “go /no-go” or categorisations such as A, B, C etc.?
- Can the system export raw data as Excel or .csv on demand so authorised users can run their own analyses?
- Can the system email short summaries of actions that have (or have not) taken place as scheduled?
- Can the system exports reports using the templates YOU want? (i.e. colours, fonts, logos, layouts AND CONTENT)

Given the above high-level list of functionality, the prospective buyer needs to consider whether each individual functionality item is “not required”, “desirable” or “mandatory” and whether they are all of equal importance (i.e.weight) or whether some are more important than others.



In addition, the prospective buyer needs to consider whether the software can accommodate the DIFFERENCES BETWEEN THEIR VARIOUS OPERATIONS; for example:

- While all sites may use the same inspection checklist, the varying sizes of the sites may indicate that inspections are carried out at different frequencies; small offices may require workplace inspections every quarter whereas large office every month
- Perhaps small offices have a simpler checklist yet do it at the same frequency as the larger sites
- Workplace inspections for Offices are different to warehouses and those of electrical component warehouses that have shelving may be different to warehouses that have racking.
- Pre-start checks for forklifts are different to that for trucks, and there may be differences between types of trucks.
- Some sites may have gas forklifts while other may have diesel, whereas some sites have loading docks and others have aprons

Another important aspect of the software to consider is how the software handles CHANGES TO THE IMS. "Continual improvement" is a key component of the IMS, and in practical terms, this requires controls and processes to evolve as gaps are identified and as internal acceptance standards increase. To expect that forms and process workflow changes will be minimal is to expect that continual improvement will be minimal since continual improvement is DIRECTLY LINKED to system evolution.

Consequently:

- How does the system handle changes in schedules, checklists and forms e.g. changes to the sequence, or the wording, of questions or addition or removal of questions etc.?
- How does the system handle changes to reporting requirements? As the level of sophistication of the IMS increases (as expected by continual improvement), how are the expectation for more extensive, sophisticated and granular reporting met?

Dashboards

.03

Dashboards provide an intuitive, visual way of grasping the status of things in one quick view. In the real world, managers however generally don't go and find the info they seek, it gets sent to them. Experience shows that managers typically don't "log in" to systems to get their informationand their "to do" lists; they expect the information and lists to come to them. Excuses abound about and are often valid; logging in to a system once a monthor a week tends to be difficult to remember and takes a long time to become second-nature, especially when everything else is "delivered" via email...

When selecting software of any type it's vital to honestly assess whether managers or supervisors will actually log in to a system to view the dashboard or whether the software should deliver status reports to relevant management users, via email. Determining whether dashboards are "selling" tools for the software vendor or real operational tools isimportant to separate the glitz from the real system information delivery method.

Additional functionality considerations .04

The structured and auditable management of TRAINING, especially competencies required for tasks, licenses and training recurrency dates is a mandatory requirement in all three the "Management System" Standards.

Can the software package integrate this mandatory control for employees and contractors?

Management of APPROVED SUPPLIERS and review of their performance using agreed metrics is a mandatory requirement of ISO9001.
In addition, from a safety perspective, suppliers have insurances, licenses and permits that also have recurrency requirements.

Can the software package integrate this mandatory control?

Ensuring services or products conform TO CLIENT'S REQUIREMENTS is another aspect of ISO9001 that requires evidence of compliance.

- Some organisations sell well-defined services or products that are known to the purchaser before the purchase, e.g. buying a company's product such as a helmet, a box of staples or a lunch sandwich, or a standard service such as a postal delivery or a waste collection service.
- Other organisations sell client-specific products or services such as a custom office fitout or a consulting project.

Case of 1 above does not fall in the scope of that specific ISO9001 requirement, however case of 2 above does. Consequently the compliant business needs to know exactly WHAT the client wants, how it's measured and how the business checks whether the product/service conforms to those agreed requirements.

Can the software package integrate the client's requirements into the business' operational process controls?

Interoperability and technical considerations .05

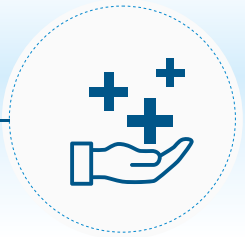
- Can the system support single sign-on via Microsoft Active Directory if required?
- Does the system enforce strong password protection?
- What are its backup protocols?
- What are its disaster recovery processes?
- Does the system have a published API to interface with other systems such as payroll or ERP to ensurecontinual update of staff or system settings if required?
- Can the system integrate with known cloud BI tools such as QlikView, Birst, Sisense etc.?
- Can the system email out information and maintain logs as evidence?
- Can the system track user logins, IP addresses date and time of access?
- Can the system notify an administrator of inactive users?
- Does the system allow data upload via Excel or similar, allowing loading of historical data?
- What is the technical support model?
- What is the user support model?
- What system functionality does the system (client) administrator have?
- Does the system allow entering of data via “public” webpages?
  (i.e. allows data entry without a login e.g. a public feedback form)

ISOPro’s approach to implementation in large organisations .06

The final aspect to consider whenever implementing any change, and specifically a new software solution that will be deployed broadly, is the CHANGE MANAGEMENT aspect in of the implementation.

- Change is generally confronting and challenging to lower-level front-line staff, can consume resources and provide an almost endless source of distraction.
- Large organisations are complex and the consultative process needs to be open and take time to work through the organisation.
  Large organisations are culturally different to small businesses and implementation of new systems and its accompanying change management impact must not be underestimated.
- Large, established organisations almost universally have broadly compliant systems that have been arrived at through a consultative approach over a long period. If this were not the case, employees would be getting injured, clients would be suing and WorkCover breach notices would be issued at above-average rates, whereas statistically, large organisations perform better in all safety metrics than smaller businesses in the same industry.

Given that large organisations typically have stable systems that are generally compliant AND change is expensive and disruptive, we firmly believe that for all organisations, the MOST EFFECTIVE path to improving one's system is, first and foremost, to fully implement, automate and report in real time the processes you already have.



This will have 3 immediate benefits:

- It has very little change management impact; the new online system, by-and-large, replicates the forms and processes that are well known to everyone. Obviously it's an opportunity to address glaring gaps as well but this is typically an exception. This means far less effort and disruption up front.
- Visibility changes behaviours **immediately**. Once people in the organisation know that you know and that they can't hide behind distance or complexity anymore, compliance automatically starts improving.
- Visibility very quickly shows what IS working and what IS NOT; this makes it easy to know what to focus on in the search for improvement. Typically it will be a few aspects (or a few people) that are "not working" rather than the "whole system". Hence the visibility shows the gaps and areas of concern so you don't end up throwing the baby out with the bathwater.

Conclusion

Compliance is far broader in scope and more ubiquitous in operations that basic "incident/injury/hazard" reporting. Once organisations investigate their "compliance" requirements they quickly realise that even sophisticated and functionality-rich OHS or Incident Management systems can't address the full scope of their needs.

In addition, when looking to implement a COTS (custom off the shelf) software solution, organisations are faced with the change management problem of changing their established processes to suit the new software.

Whilst software selection is already complicated by hardware environment and cost/benefit considerations, adding the implementation and change management risks associated with organisations' **compliance** processes makes the selection process even trickier because compliance risk may carry far more severe penalties than operational risks.

Lastly, does the software provide a seamless and scalable compliance framework that will scale from "basic" compliance like WHSE through to sophisticated industry- and client-specific requirements? Can it handle vendor, training and client/contract compliance seamlessly? And will managers really remember their username and passwords (if not on Active Directory) to log in and view their dashboard and "to do" lists?

Caveat emptor.... buyer beware!