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## Chapter 2

# COHSMS External System Evaluation



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## 1. Outline of COHSMS External System Evaluation

### 1.1 The Aim of COHSMS External System Evaluation

The aim of COHSMS External System Evaluation is to complement "internal system audit" carried out by the contractors themselves, and its purpose is to help accident prevention activities of the contractors.

It is not an "inspection" like that of ISO which is aiming at "certification", but rather, an external support for the contractors to polish up the system.

If a contractor receives COHSMS External System Evaluation and awarded with an Evaluation Note, it is a recognition that the contractor established the system based on COHSMS guidelines, implemented the system, did the internal audit of the system, and even more, it is positively making effort for daily occupational safety and health activities.

For this reason, in Japan, a contractor who received "COHSMS Evaluation Note" may be considered as a reliable company concerning safety and health management.

### 1.2 Characteristics of COHSMS External System Evaluation

Establishment of COHSMS based on the "COHSMS guidelines" is a voluntary activity by a contractor himself, and a contractor must establish, implement and revise the system by himself, taking the opinion of the workers into consideration. This is the reason the system is called a self-concluding system.

However, internal audit alone is not enough to render appropriate evaluation of the established system, and it may end up with self-satisfaction.

At the same time, some contractors who established COHSMS wanted to have objective evaluation by a third party, while the industry wanted evaluation of safety and health management and activities based on daily effort of contractors.

Under such circumstances, in order to polish up the established the system, JCOSHA started a service to complement internal system audits by giving objective system evaluation to contractors upon their request.

JCOSHA named this service as "COHSMS External System Evaluation", and started the service in January, 2003.

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## (1) COHSMS Evaluation

"COHSMS Evaluation" evaluates the system from three aspects, namely, "appropriateness", "effectiveness" and "effort", based on "COHSMS Evaluation Standard" which consists of about 300 evaluation items.

"Appropriateness" is to check whether the system is in compliance with COHSMS guidelines and appropriate for a construction workplace.

"Effectiveness" is to check whether the system is properly implemented and operated to contribute to the enhancement of safety and health level at a construction work place.

"Effort" is to check whether a contractor is making daily effort for safety and health activities.

By evaluating the system from above the aspects, COHSMS evaluation enables an evaluation of process of daily safety and health management and activities.

In the past, social reputation and evaluation of safety activities of contractors tended to be judged by outcomes only. In other words, contractors were evaluated by accidents occurred only. However, with the introduction of "COHSMS External System Evaluation", safety activities of contractors are evaluated totally by both "the outcome whether the contractor had accident or not" and "process evaluation of a contractors daily effort in safety and health management and activities".

## (2) Contractors who may apply for COHSMS External System Evaluation

COHSMS is a self-concluding system established by a contractor.

So, as a principle, COHSMS External System Evaluation can be offered to contractors who had, at least once, run a whole PDCA cycle of the system from system establishment to implementation and operation, system revision and to system audit.

Contractors who receive "COHSMS External System Evaluation" are those who wish to have external system evaluation aiming at prevention of industrial accidents by sophisticated systems.

## (3) COHSMS Evaluators

COHSMS Evaluators are officially designated "safety officers" and "safety and health consultants". In addition, there are experienced and knowledgeable safety and health experts who had worked in private companies. (They are called "JCOSHA safety experts"). These people form a "COHSMS Evaluation Team" and carry out the evaluation.

## (4) The Structure of COHSMS Evaluation

"COHSMS Evaluation" consists of three parts; "preliminary evaluation", "on-site evaluation", and "system aftercare".

"Preliminary evaluation" is to evaluate the documents such as "Occupational Safety and Health Management System Manual" etc. submitted by the contractor, before going to the site.

"On-Site Evaluation" is to go to the "Business Office" and the "Project Site" of the contractor and evaluate documents and records related to the system, as well as the implementation and operation of the system.

"System Aftercare" is offered after the issuance of Evaluation Note, to ensure continuity and maintenance of the system. Since External System Evaluation is conducted once in four years, for the interval years, JCOSHA will check and take care of the system by reviewing the internal audit documents.

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## **(5) Frequency and Duration of COHSMS External System Evaluation**

The maximum interval of COHSMS External System Evaluation is four years.

The duration of COHSMS evaluation depends on the scale of the project site, but generally speaking, preliminary evaluation, on-site evaluation and summation of the evaluation are done within 7 days or so.

As for the COHSMS Evaluation fee, we try to avoid commercialism, and in order to minimize the burden of contractors, we only charge a little over the actual expense.

## **(6) Establishment of COHSMS Evaluation Examination Committee**

The result of COHSMS Evaluation is reported to "COHSMS Evaluation Examination Committee" consisting of experts and intellectuals such as university professors. The committee reviews the fairness and appropriateness of COHSMS evaluation given by the COHSMS Evaluation team.

## **(7) Issuance of COHSMS Evaluation Note and COHSMS Evaluation Mark**

After the approval of COHSMS Evaluation Examination Committee, JCOSHA will issue "COHSMS Evaluation Note" and "COHSMS Evaluation Mark" to contractors who have established systems of a certain level.

## **(8) Announcing Contractors who received "COHSMS Evaluation Note"**

JCOSHA will announce the names of contractors who had received COHSMS Evaluation Note in journals such as JCOSHA periodical "KENSETSU NO ANZEN".

\*Please refer to flow chart of COHSMS External System Evaluation implementation at the end of this handout.

## **1.3 Evaluation Criteria of COHSMS External System Evaluation**

### **(1) Evaluation of Appropriateness of the System**

The team first evaluate the system by going through the documents submitted by the contractor, such as "Occupational Health and Safety Management System Manual" etc., based on "Evaluation items concerning appropriateness for business office and project site", stipulated in "COHSMS Evaluation Standard".

After this preliminary evaluation, the team then visits the business office and the project sites to check related manuals and record books. Using "Evaluation items concerning appropriateness for business office and for project site" as reference, the team evaluate whether the system is appropriate for the scale and the type of the contractor.

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## **(2) Evaluation of Effectiveness of the System**

- 1) At the business office, the team interviews the person who is the top manager of the system and all the people who are responsible for each level of the system, to confirm their role and responsibility in the system.

The team also attends a "Safety and Health Committee" which is an organ to feedback workers' opinion, and through the situation of "Safety and Health Committee", evaluates how the system is actually implemented and operated.

- 2) The team visit more than two project sites and attend "Accident prevention council" and "Safety meeting" where the main contractor and subcontractors meet to discuss the work or communicate each other. The team also sees daily implementation of "Safety Work Cycle", a cycle which has become so popular among Japanese construction industry, and through these experiences, check how the system is actually implemented and operated.

- 3) The team goes through the documents and also ask questions at the business office and project sites to check how internal system audit is implemented.

The result of these investigation are checked against the "Evaluation items for effectiveness for business office and for project sites" stipulated in "COHSMS Evaluation Standard", to evaluate whether the system is implemented and operated as defined, and also whether the result of such implementation is serving for the improvement of safety level of the company.

## **(3) Evaluation of Daily Effort for Safety and Health Activities**

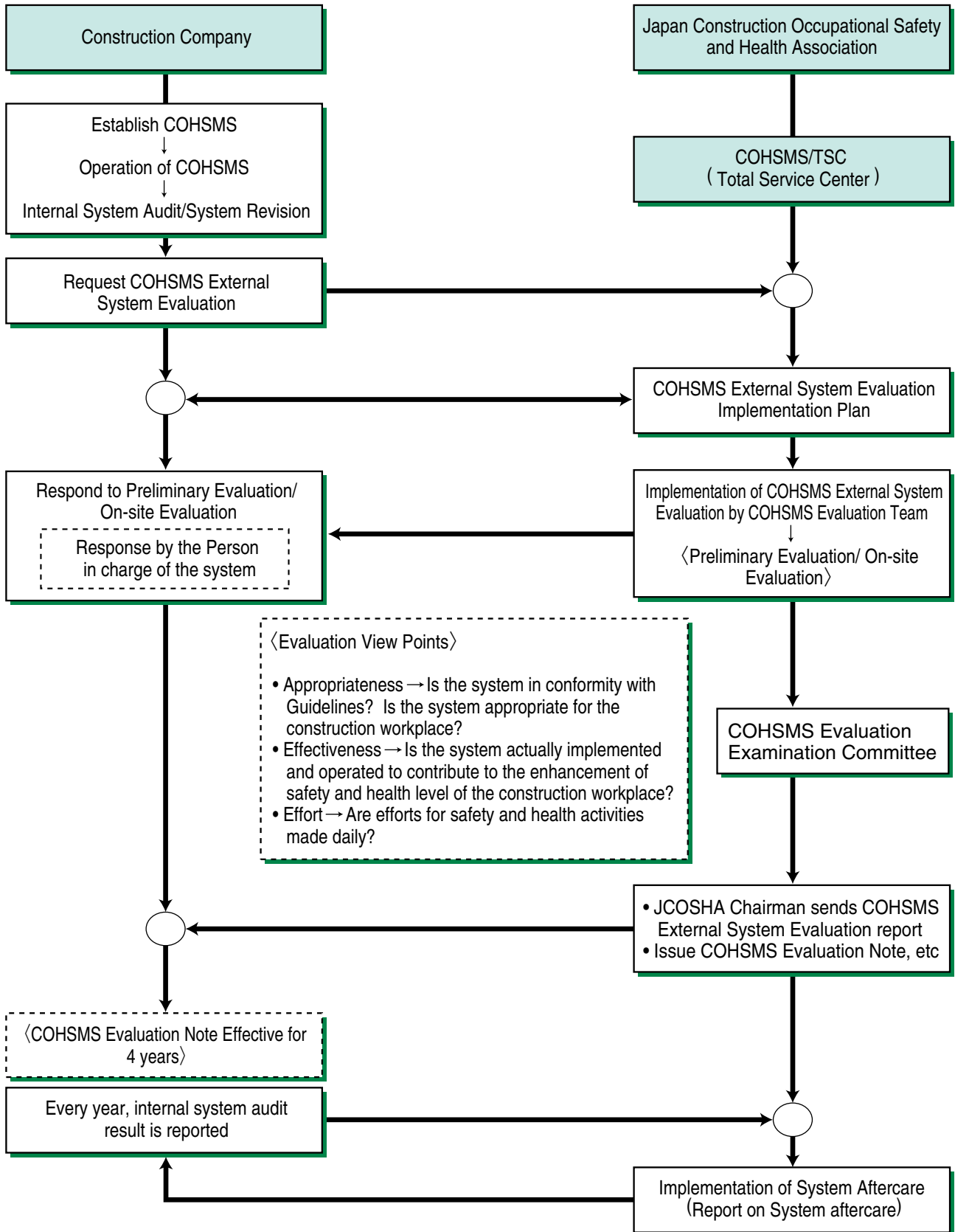
Various safety and Health activities at business office or project sites are evaluated according to "Evaluation items concerning effort" stipulated in "COHSMS Evaluation Standard".

We will also interview about unique safety and health activities of the contractor, and confirm the reality, and these activities are also evaluated as daily efforts.

## **(4) Evaluation results Summary**

Opinions of evaluators and the results of "Preliminary Evaluation" and "On-site Evaluation" are compiled into a evaluation report.

# Flow Chart of COHSMS External System Evaluation Implementation



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## 2. The Fundamentals of COHSMS External System Evaluation

JCOISHA announced "Construction Occupational Health and Safety Management System (COHSMS) Guidelines" in November 1999, based on "Guidelines on Occupational Health and Safety Management System" (hereinafter referred to as "National Guidelines") announced by the Ministry of Health, Labor and Welfare in April 1999.

The fundamentals of COHSMS External System Evaluation (hereinafter referred to as "The Fundamentals") sets the fundamentals for implementation of External System Evaluation of Occupational Health and Safety Management System contractors established following COHSMS guidelines.

### 2.1 The Objective of COHSMS External System Evaluation

COHSMS guidelines stipulate that the contractor himself should conduct system audit and should revise the system according to the results of such audit.

For contractors, in order to seek continuous enhancement of safety and health level at construction workplaces, it is important to carry out appropriate system audit by the contractors themselves (hereinafter referred to as "Internal system audit"), and constantly operate the system.

In addition to this "internal system audit", some contractors want to be evaluated by fair and objective system audit by external body (hereinafter referred to as "External System Audit") to whom they request the audit on their own initiative, to make sure the established system operate more effectively for the improvement of safety and health level at construction workplaces.

In response to such demand, JCOISHA decided to offer COHSMS External System Evaluation based on article No.4, chapter 2 of the association, by helping to complement internal system audit carried out by the contractors, for the further improvement of safety and health level of construction workplaces.

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## 2.2 Scope etc.

- (1) COHSMS External System Evaluation applies to a contractor who had established a system following the COHSMS guidelines, had carried out internal system audit, and requests on their own accord to have COHSMS External System Evaluation based on the Fundamentals.
- (2) The unit of construction workplaces where COHSMS External System Evaluation is applied is, as a general rule, the conceptual "construction workplaces" comprising a business office and project sites stipulated in COHSMS guidelines.  
If there is a higher organization above the business office, under certain conditions, the construction company as a whole may be considered as a unit COHSMS External System Evaluation is applied.
- (3) COHSMS External System Evaluation carries out the evaluation based on 29 general requirements in COHSMS guidelines, but pay due respect to the past achievements and innovative ideas of each construction workplaces.
- (4) COHSMS External System Evaluation is not something that guarantees industrial accidents or incidents will not happen at the construction workplace, nor exempt contractors or workers from legal responsibilities.

## 2.3 Terms and Definitions

Terms and definitions used in the Fundamentals follows stipulations in COHSMS guidelines (3.Definitions), and in addition, following words are defined.

### (1) Evaluation

"Evaluation" in COHSMS External System Evaluation is a comprehensive evaluation from following three view points; 1) "appropriateness", whether the system the contractor established is in compliance with COHSMS guidelines and appropriate for a construction workplace, 2) "effectiveness", whether the system is implemented and operated to contribute to the enhancement of safety and health level at a construction workplace, 3) "effort", whether the contractor is making daily effort for safety and health activities.

### (2) COHSMS evaluator, COHSMS evaluation team

"COHSMS evaluator" means a person who evaluates the system the contractor established, and who has satisfied the qualification requirements, and also approved by the chairman of JCOSHA to be a member of COHSMS evaluation team.

"COHSMS evaluation team" is a group of no less than two COHSMS evaluators, to evaluated the system established by a contractor.

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**(3) COHSMS Evaluation Note, COHSMS Evaluation Mark**

"COHSMS Evaluation Note" is a note issued after the implementation of COHSMS External System Evaluation by the chairman of JCOSHA to certify that the contractor was evaluated as appropriate.

"COHSMS Evaluation Mark" is a mark the contractor can display under certain conditions designated by the chairman of JCOSHA.

**(4) System Aftercare**

"System Aftercare" is support given for continuance and maintenance of the system after the issuance of COHSMS Evaluation Note.

## **2.4 Basic execution matters of COHSMS External System Evaluation**

**(1) Administration of COHSMS External System Evaluation**

Administration concerning the implementation of COHSMS External System Evaluation is undertaken by "COHSMS Total Service Center" (hereinafter referred to as COHSMS/TSC), according to JCOSHA's "Association Regulations"

**(2) Standards for Qualification and Selection of Evaluators etc.**

Standards of qualifications and selection of evaluators are based on "Standards for COHSMS Evaluators Qualification and Selection"

**(3) Elements of COHSMS External System Evaluation**

External System Evaluation consists of preliminary evaluation, on-site evaluation, and system after-care.

**(4) COHSMS Evaluation Standards**

Evaluation is done based on "COHSMS Evaluation Standards".

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## (5) Implementation of COHSMS External System Evaluation

COHSMS External System Evaluation is carried out according to the following order, and the detail is stipulated in "General Information on COHSMS External System Evaluation" (hereinafter referred to as GI)

- a Application for COHSMS External System Evaluation (contractor → Chairman of JCOSHA)
- b Submission of COHSMS External System Evaluation Implementation Plan (Chairman of JCOSHA → contractor)
- c COHSMS External System Evaluation Contract (Chairman of JCOSHA ← → contractor)
- d Implementation of COHSMS External System Evaluation < Preliminary evaluation of system regulations → on-site evaluation (business office/project sites) > (Chairman of JCOSHA → contractor)
- e Report of evaluation results and issuance of Evaluation Note (Appendix E) (Chairman of JCOSHA → contractor)
- f Submission of internal system audit report < Every year after the issuance of COHSMS Evaluation Note > (contractor → Chairman of JCOSHA)
- g Implementation of system aftercare upon receipt of internal system audit report < Every year after the issuance of COHSMS Evaluation Note > (Chairman of JCOSHA → contractor)

## (6) Announcing the names of contractors who had received COHSMS Evaluation Note

Chairman of JCOSHA will make public following information concerning the contractors who have received COHSMS Evaluation Notes in publications such as JCOSHA periodical "KENSETSU NO ANZEN".

- a Name of the contractor
- b Name of the construction workplace, and address, etc.
- c Date of issuance of COHSMS Evaluation Note/the period of validity

## (7) Use of COHSMS Evaluation Mark

Contractors who have received COHSMS Evaluation Notes may display COHSMS Evaluation Marks by following means.

- a Printing in construction workplace brochures, envelopes, business cards and other publications.
- b Displaying on the temporary walls of the project site, project offices, etc.

## (8) COHSMS External System Evaluation Cost etc.

COHSMS External System Evaluation Cost will be estimated based on "Standards for COHSMS Evaluation Cost etc."

## (9) Management of Documents concerning COHSMS External System Evaluation

Custody, revision, and management of the documents related to COHSMS External System Evaluation follows "Regulations on Handling of Documents" designated by chairman of JCOSHA.

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**(10) Cancellation or return of COHSMS Evaluation Note, Suspending use of COHSMS Evaluation Mark**

Chairman of JCOSHA can cancel the issuance of COHSMS Evaluation Note to the contractor if any of the acts listed below is found out. If such case occurs, the contractor should return COHSMS Evaluation Note to chairman of JCOSHA immediately, and should refrain from using COHSMS Evaluation Mark.

- a If there was any breach to "The Fundamentals", "GI" or any standards related to COHSMS External System Evaluation.
- b If COHSMS Evaluation Note and/or COHSMS Evaluation Mark were used in unjust way.
- c If there was any social misconduct.

**(11) Duty of Confidentiality**

JCOSHA must observe confidentiality, and anybody engaged in COHSMS External System Evaluation must not disclose any of the information obtained from the contractor to the third party, unless legally requested, nor the situation is any of the followings.

- a If information concerning COHSMS External System Evaluation provided by the contractor was what JCOSHA already had.
- b If information provided by the contractor was what was already publicized and known to everybody.
- c If information provided by the contractor was already used widely in the society.
- d If the information was obtained by JCOSHA through a third party without any obligation of confidentiality.

**(12) Others**

Other issues not stipulated in "The Fundamentals" should follow "Internal Regulation of JCOSHA", and will be dealt accordingly.

## **2.5 Enforcement of "The Fundamentals"**

"The Fundamentals" is enforced from January 1<sup>st</sup>, 2003.

# Appendix E



## Construction Occupational Health and Safety Management System (COHSMS)

### Evaluation Note

Evaluation Note No. : \_\_\_\_\_

Date of Issuance : \_\_\_\_\_ (valid for four years)

Name of the Contractor : \_\_\_\_\_

Address : \_\_\_\_\_

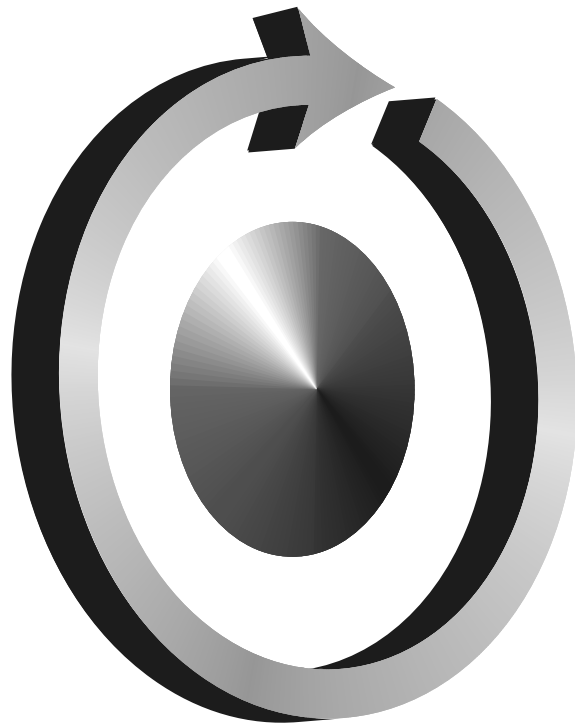
We hereby issue this Evaluation Note to endorse that after implementing External System Evaluation, we confirmed that the Occupational Health and Safety Management System is well established, implemented, and managed and also internal audit is fully functioning, as well as positive attitude to daily safety and health activities.



Japan Construction Occupational Safety and Health Association  
Chairman, Kazuyoshi Zenidaka

# Appendix F

## Evaluation Mark



COHSMS

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**JCOSHA**





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