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SSOW ASSURANCE, AUDIT & REVIEW FRAMEWORK

A PRACTICAL GUIDE FOR UK INDUSTRIAL OPERATONS.

OPERATIONAL ASSURANCE GROUP
SPECIALISTS IN SAFE SYSTEMS OF WORK & INDUSTRIAL RISK CONTROL

SSoW Assurance, Audit & Review Framework

A Practical Guide for UK Industrial Operations

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1. Executive Summary

Safe Systems of Work (SSoW) are fundamental to controlling risk in high-hazard environments. However, the effectiveness of an SSoW is not determined by its existence—but by its application in live operations.

This white paper sets out a structured, practical approach to **assuring, auditing, and continuously improving SSoW**, aligned with the mission and principles of Operational Assurance Group:

"To protect people and businesses by delivering practical, audit-ready safe systems of work and risk control solutions that enable confident operational delivery."

The guide focuses on bridging the gap between **documented intent and operational reality**, ensuring systems are not only compliant but genuinely effective.

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2. Purpose of SSoW Assurance

SSoW assurance provides confidence that:

- Risks are **identified, assessed, and controlled**
- Controls are **implemented as intended**
- Systems remain **effective over time**
- Organisations are **aligned with UK regulatory expectations**

Key UK regulatory drivers include:

- Health and Safety Executive (HSE)
- Health and Safety at Work etc. Act 1974
- Management of Health and Safety at Work Regulations 1999
- Construction (Design and Management) Regulations 2015 (CDM)
- Control of Substances Hazardous to Health (COSHH)
- Provision and Use of Work Equipment Regulations (PUWER)

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3. Operational Assurance Group Philosophy

Core Principles in Practice

Safety as Standard
Every audit decision prioritises risk reduction and protection of people.

Built for the Real World
Verification focuses on *what actually happens*, not just documented processes.

Compliance Without Complication
Audits test clarity and usability—not just technical correctness.

Operational Alignment
Systems are assessed against real workflows, constraints, and pressures.

Audit-Ready by Design
Traceability, clarity, and structure are central to every review.

Clear & Direct Communication
Findings are actionable, not theoretical.

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4. How to Audit a Method Statement / SSoW in Practice

4.1 Pre-Audit Preparation

- Define scope (task, project, or system-level)
- Identify applicable regulations and standards
- Gather:
    - Method statements / RAMS
    - Risk assessments
    - Permits and procedures
    - Training and competency records

4.2 Desktop Review (Document Assurance)

Assess the SSoW against:

Clarity & Structure

- Is the task clearly described?
- Is sequencing logical?
- Are roles and responsibilities defined?

Risk Identification

- Are hazards specific to the environment?
- Are interfaces (SIMOPS, contractors) considered?

Control Measures

- Are controls:
    - Suitable?
    - Sufficient?
    - Clearly defined?
- Do they follow the **hierarchy of control**?

Usability

- Can a supervisor or operative realistically follow it?
- Is language accessible?

Compliance Check

- Alignment with HSE guidance (e.g. HSG65, INDG163)
- Sector-specific requirements (construction, COMAH, etc.)

4.3 Field Verification (Reality Check)

This is where assurance becomes meaningful.

Ask:

"Is the work being carried out in line with the documented SSoW?"

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5. Leading vs Lagging Indicators

Leading Indicators (Predictive)

- Quality of SSoW documentation
- Workforce understanding (briefings/toolbox talks)
- Supervisor engagement
- Frequency of site inspections
- Close-out rate of actions

Lagging Indicators (Reactive)

- Incidents and near misses
- Non-compliances
- Enforcement actions
- Audit failures

Balanced Approach

High-performing organisations prioritise **leading indicators** while learning from **lagging data**.

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6. Site Vérification Techniques

6.1 Observations

Focus on:

- Task execution vs documented method
- Use of controls (PPE, barriers, permits)
- Behaviour under pressure

Key question:

“What actually happens when no one is watching?”

6.2 Interviews

Engage with:

- Operatives
- Supervisors
- Site managers

Ask:

- “Can you explain how you do this task?”
- “What would you do if something changed?”
- “What are the biggest risks?”

Look for:

- Understanding vs memorisation
- Confidence vs uncertainty
- Consistency across teams

6.3 Sampling

- Select random tasks or shifts
- Review permits, isolations, or specific activities
- Check:
    - Documentation vs execution
    - Consistency across teams

6.4 Triangulation

Combine:

- What is **written**
- What is **said**
- What is **done**

Gaps between these indicate risk.

7. Red Flags: Identifying "Paper Compliance"

Key warning signs include:

Documentation Issues

- Generic, copy-paste method statements
- Overly complex or excessively long documents
- Lack of task-specific risk detail

Operational Disconnect

- Workforce unaware of SSoW content
- Controls not implemented in practice
- Supervisors relying on experience rather than procedure

Cultural Indicators

- "Tick-box" briefings
- Documentation completed retrospectively
- Resistance to questioning or challenge

Audit Signals

- Perfect paperwork with poor site conditions
- Repeated findings with no improvement
- High lagging indicators despite "compliance"

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8. Closing the Loop: Continuous Improvement

8.1 Lessons Learned

- Capture from:
    - Audits
    - Incidents

    - Near misses
- Feed back into:
    - SSoW updates
    - Training
    - Risk assessments

8.2 Action Management

- Assign clear ownership
- Define realistic deadlines
- Track completion and effectiveness

8.3 Review Cycles

SSoW should be reviewed:

- After incidents
- When processes change
- Periodically (risk-based frequency)

8.4 Continuous Improvement Model

Aligned with HSE's **Plan-Do-Check-Act** cycle:

- **Plan** – Develop SSoW
- **Do** – Implement on site
- **Check** – Audit & verify
- **Act** – Improve and refine

9. Integrating Operational Assurance Group's Approach

Your structured methodology aligns directly with effective assurance:

1. Discovery & Scoping

Defines audit scope and risk priorities

2. Site Familiarisation

Ensures understanding of real-world constraints

3. Assessment & Gap Analysis

Core audit and verification activity

4. Document Development

Improves clarity and usability of SSoW

5. Implementation Support

Bridges the gap between paper and practice

6. Review & Approval

Ensures audit readiness and compliance

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10. Delivering Audit-Ready Systems

An effective SSoW should be:

- **Clear** – Easily understood by those doing the work
- **Practical** – Usable in live environments
- **Compliant** – Meets regulatory requirements
- **Traceable** – Demonstrates decision-making and controls
- **Verified** – Proven to work in practice

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11. Conclusion

SSoW assurance is not about documentation—it is about **confidence in safe delivery**.

Organisations that succeed:

- Focus on **real-world application**
- Prioritise **engagement over paperwork**
- Use audits as a **tool for improvement**, not just compliance

Operational Assurance Group's approach ensures that:

- Systems are **built for reality**
- Audits are **meaningful**
- Outcomes are **practical and sustainable**

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12. Final Thought

A safe system of work is only effective when the person doing the job understands it, trusts it, and uses it.

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13. Contact Us

Operational Assurance Group Specialist Consultancy in Safe Systems of Work & Industrial Risk Control

For further information or support, please get in touch.

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