4.4.5 DOCUMENT CONTROL

DOCUMENTATION DEFINED

ISO 14001 uses 'documented' to mean any situation in an EMS where something must be put in writing. In practice, documents include policies, procedures, manuals, plans, diagrams, flow-charts, memoranda, and correspondence related to the EMS. Records are also documents, but ISO 14001 treats them separately. A simple rule is that:

- Documentation states what must, or should happen

- Records contain information on what has happened.

ISO 14001 specifies requirements for documentation in only ten instances. However, quality in a management system means doing things consistently, and documenting operating procedures can be an effective way to promote consistency. So it is inevitable that considerably more than ten topics in an EMS will have documentation attached to them.

As in life, moderation in all things is the key. It is not necessary to make work by documenting everything in an EMS. Prudence is needed when deciding which issues will benefit from being put in writing to avoid creating a paper or electronic mountain of material. An additional key factor is to ensure documents are controlled to avoid confusion in the system. Element 4.4.5 in ISO 14001 covers the administrative principles of document control.

ISO 14001 4.4.5 DOCUMENT CONTROL says:

The organization shall establish and maintain procedures for controlling all documents required for this International Standard to ensure that:

(a) they can be located

(b) they are periodically reviewed, revised as necessary, and approved for adequacy by authorized personnel

(c) the current versions of relevant documents are available at all locations where operations essential to the effective functioning of the EMS are performed

(d) obsolete documents are promptly removed from all points of issue and points of use, or otherwise assured against unintended use

(e) any obsolete documents retained for legal and/or knowledge preservation purposes are suitably identified.

Documentation should be legible, dated (with dates of revision), and readily identifiable, maintained in an orderly manner and retained for a specified period. Procedures and responsibilities shall be established and maintained concerning the creation and modification of the various types of document.

THE SPECIFICS OF DOCUMENT CONTROL

ISO 14001 specifies some common-sense requirements for the control of documents. Documents must be:

- Available where and when needed by personnel responsible for the operation of the EMS

- Clear, up-to-date, identifiable (i.e., clearly marked), dated, stored neatly and logically, and kept for a specified period of time

- Developed, reviewed, revised, and approved only by authorized personnel

- Removed from use when they become obsolete

- Archived and marked as such, or destroyed.

The ten instances for which ISO 14001 specifies 'documented' procedures are:

4.2	Environmental policy
4.3.3	Environmental objectives and targets
4.4.1	Roles, responsibilities, and authority for the EMS
4.4.3	Communications from external interested parties
4.4.4	EMS core elements
4.4.6	Procedures essential for operational control
4.5.1	Monitoring and measurement of operations that have actual or potentially significant environmental impacts
4.5.1	Compliance with legislation and regulations

4.5.3	Records
4.6	Management review.

In reality, documentation is essential in several other situations, including:

4.3.1	Matrix of environmental aspects and impacts, and their significance
4.3.2	Registry of legal and other requirements
4.3.4	Environmental management Programs, or action plans to achieve objectives and targets
4.4.2	Results of training needs assessments, and training plans
4.4.7	Emergency response plan
4.5.2	Corrective and preventive action plans and their implementation
4.5.4	Environmental audit procedures and results.

Practical Hints on Document Control

As with all its specifications, ISO 14001 does not stipulate how to control documents, but rather the outcomes that must be achieved. There is not time during this lesson to go in depth into the practical details of document control, but following are some ideas:

- Documents (procedures) should have a standard format and layout for consistency and completeness. A documented procedure could include:

    - title, and author or originator

    - organization, department or function

    - purpose, scope, definitions of terms used in the procedure

– description of the procedure, including persons responsible for authorising, supervising, carrying out, and approving results of the procedure

– records, forms, related documents, and references to source materials

– authorised approval signature(s)

– date first approved and subsequent review and revision dates.

- Printed copies of Level 2 and 3 documents should be marked as 'uncontrolled', with a message that the printed copy may not be the latest version, and a reference to the electronic version or master copy.

- Controlled versions of documents are best stored electronically, if possible on networked computer files with restricted access to authorized persons, and 'read only' versions.

- Changes to documents should be made only by authorised personnel.

- Documents must be regularly reviewed for accuracy and relevance and, whenever necessary, updated.

- There must be a means of notifying all affected personnel when a document is changed.

- When paper copies of a document are in circulation (e.g., the emergency response manual), a distribution list must be maintained to ensure all copies are updated simultaneously, and obsolete information is promptly destroyed or archived.

- It is important to train selected personnel on how to prepare documents, and all managers and employees on how to access and use them.

Document control can be a nightmare if not done properly, but with diligence and careful planning it can be a dream, almost.

SUMMARY OF KEY POINTS

- Documentation associated with the EMS must be controlled to ensure order and consistency.

- Only specific, authorised individuals may create or change EMS documents.

- All employees must have easy access to documentation that is relevant to their functions and responsibilities in the EMS.

- Computerised storage of documentation is the most efficient method for control of and access to documents.

- Documented procedures must be stored in an orderly manner, identifiable, legible, dated, and should have a consistent format and style.

- Only the latest version of a document should be available when and where it is needed.

- Paper copies of controlled documents should be marked 'uncontrolled' to alert the reader that a more recent version may be available on the computer.

- Outdated documents must be removed from use and either destroyed or labelled as obsolete and archived.