

Gap Analysis Guidance

ISO 14001:2015 Self-assessment

Table of Contents

| | | |
|----------|--|-----------|
| 1 | Introduction | 3 |
| 1.1 | Businesses With an Existing EMS | 3 |
| 1.2 | Businesses Without a Management System | 3 |
| 1.3 | Gap Analysis Planning | 4 |
| 1.3.1 | What is a Gap Analysis? | 4 |
| 1.3.2 | What Does a Gap Analysis Involve? | 5 |
| 1.3.3 | What Does a Gap Analysis Achieve? | 5 |
| 1.3.4 | Performing a Gap Analysis | 6 |
| 1.4 | Using the Gap Analysis Tools | 6 |
| 1.4.1 | Part A - Gap Analysis Checklist | 6 |
| 1.4.2 | Part B - Findings List | 7 |
| 1.4.3 | Part C – Gap Analysis Action Plan | 8 |
| 1.5 | Managing the Change | 10 |
| 1.5.1 | Top Management Commitment | 10 |
| 1.5.2 | Team Meetings | 11 |
| 1.5.3 | Implementation Team | 11 |
| 1.5.4 | Steps to Implementation | 12 |
| 1.5.5 | Choosing a Certification Body | 13 |
| 2 | Summary of Key Concepts | 13 |
| 2.1 | Context of the Organization | 13 |
| 2.2 | Leadership | 14 |
| 2.3 | Risks and Opportunities | 14 |
| 2.4 | Interested Parties | 15 |
| 2.5 | Life-cycle Perspective | 15 |
| 2.6 | Performance Evaluation | 16 |
| 2.7 | Documents & Records | 16 |
| 3 | Five Step Gap Analysis | 17 |
| | Step 1 - Assign Responsibilities | 17 |
| | Step 2 - Schedule the Gap Analysis | 18 |
| | Step 3 - Perform the Gap Analysis | 18 |
| | Step 4 - Review and Report the Findings | 19 |
| | Review the Findings | 19 |
| | Describe the Objective Evidence | 20 |
| | Describe any Nonconformities | 20 |

| | |
|---|-----------|
| Summarize the Gap Analysis _____ | 20 |
| Report the Findings _____ | 21 |
| Step 5 - Implement Actions and Improve the EMS _____ | 21 |
| Implement Actions to Fill the Gaps _____ | 21 |
| Use the Process Approach _____ | 22 |
| Check for Improvement _____ | 23 |
| 4 Want to Learn More About ISO 14001? _____ | 23 |

| Clause | Documentation Requirement |
|--------|--|
| 6.1.1 | Maintain documented information relating to; (a) risks and opportunities that need to be addressed, and (b) processes needed in Section 6 to the extent necessary to have confidence they are carried out as planned |
| 6.1.2 | Maintain documented information relating to; (a) environmental aspects and associated environmental impacts, (b) criteria used to determine significant environmental aspects, and (3) significant environmental aspects |
| 6.1.3 | Maintain documented information concerning compliance obligations |
| 6.2.1 | Maintain documented information on the environmental objectives |
| 7.2 | Retain appropriate documented information as evidence of competence |
| 7.4.1 | Retain documented information as evidence of communication, as appropriate |
| 7.5.1 | The EMS must include: (a) documented information required by 14001:2015, and (b) documented information determined by the organization as being necessary for the effectiveness of the EMS |
| 8.1 | Maintain documented information to the extent necessary to have confidence that processes have been carried out as planned |
| 8.2 | Maintain documented information to the extent necessary to have confidence that processes are carried out as planned |
| 9.1.1 | Retain appropriate documented information as evidence of the monitoring, measurement, analysis and evaluation results |
| 9.1.2 | Retain documented information as evidence of the compliance evaluation result(s) |
| 9.2.2 | Retain documented information as evidence of the implementation of the audit programme and the audit results |
| 9.3 | Retain documented information as evidence of the results of management reviews |
| 10.2 | Retain documented information as evidence of: (a) the nature of the non-conformities and any subsequent action taken, and (b) the results of any corrective action |

3 Five Step Gap Analysis

Step 1 - Assign Responsibilities

Who did you identify to conduct the gap analysis? In the ideal situation this person will also be the Management Representative since skills in project management and auditing are highly beneficial.

A gap analysis can be done by someone with less auditing experience, given that they are willing to learn and interpret the requirements of ISO 14001:2015, and are available to put the time in necessary to learn and understand the gap analysis process.

The people undertaking gap analyses exercises should be objective, be open minded, listen, communicate clearly and report fairly without bias, and familiar with the standard in order to perform an effective analysis. If your auditors have not been trained on the ISO 14001 requirements, be sure to provide training before performing the gap analysis.

Gap analysis exercises are often a time-consuming, in-depth process. Ideally, the person (or team) running the gap analysis will have experience in auditing. Whether or not you have an employee available with that kind of background of course depends on your company. If you are a small company without someone experienced to lead your gap analysis, do not despair!

Alternatively, there are professional ISO 14001 gap analysis consultants that may be hired to run the analysis for you. These professionals can greatly decrease the time spent on a gap analysis, compared to someone outside the ISO 14001 management field.

Though hiring one of these professional consultants may be more expensive than assigning one of your own employees to run the gap analysis, hiring a professional will save you a great deal of time in the long run.

Step 2 - Schedule the Gap Analysis

Now that you have completed the preliminary steps, set up a date to conduct the gap analysis. Make sure that your employees know the date and time for the gap analysis, especially if you've hired a professional consultant.

The audit schedule should be approved by a member of your organization's management before the start of the gap analysis cycle. When changes are made in timing, or auditors, records with justification for changes should be maintained.

Schedule the gap analysis, and communicate to all employees what is being done, and why. You will want to be able to make the employees comfortable with answering your auditor's questions. You may want to consider sending out a newsletter to inform employees that the gap analysis will be performed, by whom, when and why the gap analysis is being performed.

Determine whether you intend to audit by process, procedure, or by area of the facility, our recommended approach is usually to audit by each area of the facility. Divide the facility into manageable areas and schedule time to audit each section of the standard that applies to the area. If you are using an audit team, assign the team to cover the various areas of the facility.

Arrange your gap analysis checklists so each auditor will have the sections of the standard that are applicable in the areas of the facility they will cover.

Step 3 - Perform the Gap Analysis

Consider the effectiveness of what is being practiced on a day-to-day basis. It is not unusual for an organization to overlook something which needs some work to make it effective. Prior to commencing, you should answer the following questions; a 'no' indicates a gap and an area you will need to concentrate on.

1. Are Top management engaged and involved with the EMS?
2. In addition to existing environmental/health and safety functions/teams, are other functions involved with the EMS; e.g., procurement, design, production, finance, HR and operations?
3. Is the management system integrated with business processes such as project sign off, competency matrices, procurement requirements and business communications and meetings?
4. Does your EMS take account of the risks and opportunities resulting from trends, macro environmental or big picture issues (political, economic, social, etc.)?
5. Does the EMS consider the impact of a changing environment on your organization?
6. Do the requirements of internal and external stakeholders help shape the EMS?
7. Is there an existing environmental or safety communication plan (formal or informal) in place?
8. Are robust monitoring and measurement and internal audit procedures in place to ensure environmental data is reliable?
9. Are environmental aspects considered at each stage of the lifecycle?

10. Are environmental requirements imposed upon contractors and suppliers?
11. Is information on significant impacts made available to end users and those involved with final disposal and transport of your products or services?

If you have elected to do the gap analysis yourself, you should still let your employees know when you plan on conducting the analysis to ensure that they are at the top of their game and can answer the questions detailed in this gap analysis checklist.

Remember, the gap analysis focuses on the present, so only look at processes you have in place currently, not ones you are planning to add in the future, and remember to take thorough notes on your findings as you go through the gap analysis.

Following the schedule that you prepared, go into each area of the facility to evaluate the current environmental management system. Focus on what is in place, and what is not in place. Remind auditors that you are not focusing on compliance or nonconformity to the current system, but on the design of the current system, and how it matches ISO 14001's requirements.

Gap analyses can be conducted with small groups of staff. For example, a gap analysis can be conducted with the senior management group and a separate gap analysis with middle management and/or operational staff. It is not unusual to receive different responses to questions depending on the position and level of staff within the organization.

When sampling or interviewing employees, the auditor needs to decide on how many samples to take. The recommended approach is to start with two or three samples or interviews, and if uncertainty or errors, then take additional samples. Take notes on what is in place, and what will need to be developed and changed, also, take complete notes, including reference documents and examples.

An important consideration in using the gap analysis checklist is that, for most staff, this will be an introduction to an audit-like process and the practical aspects of an EMS. It is therefore important that it is a positive experience from all perspectives.

Any gap analysis or audit should be focused on the processes and the overall system, not the individuals following the practices and procedures provided.

Allow enough time to do an in-depth audit. The more information you can provide for your findings list and for the action plan, the more efficient and effective your implementation project will be. When the gap analysis has been completed, meet with the auditors to summarize the results.

Step 4 - Review and Report the Findings

Review the Findings

After the gap analysis has been completed, examine the findings and take a look at what needs improvement, and what already fulfils the requirements. Where gaps have been identified these should be included in the findings list in Part B. This plan should detail the gaps and the actions to be taken (what, when and by whom) to correct and implement the outstanding EMS components.