

*This sample policy/procedure must be customized to fit the needs of your company. It must be integrated into other policies/procedures and processes as required. This is not meant to be used "as-is", but must be adapted to reflect your company needs and processes.*

**[insert company info here]**

## **OCCUPATIONAL HEALTH AND SAFETY MANAGEMENT SYSTEM RECOGNITION BY A THIRD PARTY AUDITOR**

<b>Date of Issue:</b>	
<b>Written by:</b>	<b>Date:</b>
<b>Reviewed by:</b>	<b>Date:</b>
<b>Approved by:</b>	<b>Date:</b>

### **PURPOSE**

The Company has created the Occupational Health and Safety Management System Recognition by a Third Party Auditor Standard to ensure that our Health & Safety program continues to meet, and in some areas, exceed the requirements of the Health & Safety Excellence Program, the Ontario Ministry of Labour OHSA and Regulations, and Canada Labour Code and Regulations.

The objective of the Occupational Health and Safety Management System Recognition by a Third Party Auditor Standard is to assist the company in implementing, monitoring, evaluating, and continually improving our Health & Safety Management System by ensuring that it conforms to the IHSA COR Audit Tool. The COR Audit Tool will also assess the OHS performance and identify opportunities for improvement to the management system.

### **SCOPE**

The Company is committed to performing an internal audit of the Health & Safety Management System annually and performing an external audit every three years. The audit will include a review of the Return to Work standards and the Health and Safety Program.

A formal audit plan will be developed and approved for the HSMS Audit that outlines the audit criteria, audit scope, audit schedule, and needed audit resources.

Based on the findings of the HSMS Audit a formal Continual Improvement Plan will be developed, implemented, and reviewed to correct all identified non-conformities. The CIP will be developed to improve on the HSMS and will use information from the audit results, as well as suggestions from all employees of the company. All non-conformities identified will be reviewed and monitored by senior management on a quarterly basis.

**DEFINITIONS**

<p>External Audit</p>	<p>An External Audit is a periodic audit conducted by an independent qualified auditor with the aim to validate your Occupational Health and Safety Management System (OHSMS) against a standard set of requirements, such as ISO 45001, the Ontario Ministry of Labour’s Occupational Health and Safety Management System Accreditation Standard, Certificate of Recognition (COR) or other recognized standard. External Audits by a third party will be completed along with internal audits as part of an audit strategy to show that your organization is maintaining the OHSMS and addressing any non-conformities that have been identified.</p>
<p>Occupational Health and Safety Management System (OHSMS)</p>	<p>An occupational health and safety (OHS) management system encompasses more than just your health and safety program. It includes health and safety policies, systems, standards, and records, and involves incorporating your health and safety activities and program into your other business processes. Having an effective management system improves your ability to continuously identify hazards and control risks in your workplace.</p>
<p>HSMS Audit</p>	<p>An evaluation of an organizations Health and Safety Management System against the COR Audit Tool</p>
<p>Conformity</p>	

	The fulfilment of the requirements of the audit, legislation and the workplace's health and safety policies and procedures (standards).
Non-Conformity	<p>The non-fulfilment of or deviation from the requirements. Non-conformities are classified as:</p> <p><b>Priority Non-Conformity:</b></p> <ul style="list-style-type: none"> <li>• The issue will continue to occur because of how the HSMS and health and safety program are structured</li> <li>• There is a high risk to the worker's health and safety if the requirements are not met</li> <li>• There are serious legal implications</li> <li>• is an accumulation of related minor non-conformities.</li> </ul> <p><b>Minor Non-Conformity:</b></p> <ul style="list-style-type: none"> <li>• The HSMS structure is valid, but there was minor deviation because of for example, human error</li> <li>• There is not high risk to workers</li> <li>• There are no significant legal implications</li> </ul>

## ROLES & RESPONSIBILITIES

### Senior Management

- Initiate the development, approval and implementation of an annual Audit Plan
- Required to ensure appropriate resources are made available
- Required to assign a "Qualified Auditor"
- Required to review the previous year's Audit/Audit Report CIP prior to the Audit to ensure completed action items have been implemented and their effectiveness
- Required to review the previous year's Audit/Audit Report CIP prior to the Audit to ensure open action items are progressing as planned to successful completion
- Required to review and sign-off on the completed IHSA COR Audit
- Responsible to develop and start a priority based Continual Improvement / Action Plan to address the findings of the IHSA COR Audit
- Required to ensure the Continuous Improvement/Action Plan is started in the year the audit was conducted

- Required to review and sign-off on the Continual Improvement / Action Plan
- Required to review and monitor the Continual Improvement/Action Plan on a quarterly basis until completed

#### **Lead Auditor/Assistant Auditor**

- Responsible for carrying out assigned responsibilities given by senior management to conduct the audit
- Attend all Auditor training courses required by Senior Management to be deemed a “competent auditor” prior to starting the HSMS Audit
- Required to review the previous year’s Audit/Audit Report CIP with Senior Management prior to the Audit to ensure completed action items have been implemented and their effectiveness
- Required to review the previous year’s Audit/Audit Report CIP with Senior Management prior to the Audit to ensure open action items are progressing as planned to successful completion
- Conduct the IHSA COR Audit according to the Audit Plan and the COR Program Guidelines
- Conduct the audit following the auditor training ethical policy
- Maintain all personal and privileged information gathered for the purpose of the audit confidentiality
- Document all evidence collected during the audit
- Determine findings for all criteria of the audit based on the collected evidence
- Required to sign-off and date the completed audit and any additional audit reports
- Present the audit findings and/or audit report to Senior Management

#### **Managers/Supervisors**

- Participate in the audit as required, and support the implementation of the CIP
- Recommend changes during the audit process as needed
- Assist the Auditor and Senior Management in the audit process, and implementation of any improvements noted in the CIP

#### **Workers**

- Participate in the Audit process and CIP
- Cooperate with managers/supervisors and senior management in compliance and implementation of the health and safety management system

#### **Joint Health and Safety Committee Members**

- Participate in the Audit process and CIP
- Recommend items during the audit using knowledge of safety standards

#### **PROCEDURE**

### **1. The Appointment of an Auditor**

- a) The process will start by appointing an independent auditor. The company will hire a competent and qualified Auditor who is not regularly employed by the organisation. The independent auditor(s) will be chosen based on their reputation, qualifications, and skills as laid out in the training section of this document.

### **2. Acceptance of the project**

- a) The next step of the process is the terms of engagement. The independent auditor confirms that he or she has accepted the appointment. He or she will be informed of the scope of the audit plus his or her expected responsibilities throughout the contract.

### **3. Initiate and Prepare Audit**

- a) Review and Revise the External Audit Program Standard (If Necessary)
- b) Determine the resources and time necessary to complete the audit
- c) Initiate the development and approval of an Audit Plan which includes audit objectives, scope, criteria, and schedule
- d) The auditor will meet with senior management to review the audit plan, protocol and ethics
- e) Management and the Auditor will review the results from the Internal Audit/Audit Report CIP prior to the Audit to ensure completed action items have been implemented and their effectiveness, as well as to ensure open action items are progressing as planned to successful completion
- f) All non-conformity items listed on the previous year's CIP that have NOT been completed will carry over as non-conformities on the current year audit and current years CIP
- g) The Audit will be completed in accordance with the Audit Plan and its implementation and procedures

### **4. Conduct Audit**

- a) The competent independent auditor will conduct the audit, with assistance from the company's internal auditor and other employees as required.
- b) The independent auditor reviews prior Audits and CIP's along with other evidence available for the audit, to determine conformity of the system to the audit criteria, documenting the evidence used to complete the Audit (documentation, interviews, and observation)
- c) The Auditor determines the findings (conformity or non-conformity) from the reviewed evidence for each specific audit criteria and WSIB Employer Guidelines based on the gathered evidence and according to the audit criteria

## **5. Audit Report**

- a) The competent independent auditor will write the report citing findings from the Audit. This report will be used to update the CIP for use in the upcoming year and will conduct quarterly reviews during the new year and prior to the newest audit being completed
- b) The competent independent auditor will sign-off on the audit report

## **6. Management Review**

- a) The auditor will present the Audit/Audit Report to senior management for final review, approval and management sign-off, presenting any other evidence collected during the audit

## **7. Continual Improvement Plan**

- a) The CIP will be developed with assistance of the auditor, and Senior Management for use once the audit is completed, and will monitor its implementation during the calendar year between audits
- b) The created CIP for identified non-conformities will address the following: specific corrective action points, assignment of responsibilities, and timelines to bring all non-conformities into conformities. Non-conformities will be prioritized by high risk hazards and legal requirements based on the findings of the audit
- c) The CIP shall indicate the risk rating of the non-conformity based on the company risk rating system
- d) The CIP will also identify any legislative gaps identified and rectified as reasonably possible for compliance (the length of time will be determined by the risk ranking, frequency of the work being conducted and exposure of firm)
- e) The CIP will be reviewed quarterly during the calendar year of its implementation for any revisions
- f) During review, all completed items shall be reviewed for implementation and effectiveness, prior to being listed complete on the CIP

### **COMMUNICATION:**

The Company's participation in HSMS Audits will be communicated to all of our employees in our Orientation Program, HSE Bulletins and/or through payroll HSE Distribution. Our Health & Safety Management System Standards, Policies and Practices are also reviewed with employees at that time. We revise our program annually and workers receive Spring Training on the new incentives, program changes, audit results and our continual improvement program.

Communication specific to the audit will be as follows:

1. Upcoming audits will be communicated to all company team members

2. Findings in the audit will be reviewed by senior management. A summary of the audit findings will be posted on all company health and safety boards
3. CIP will be communicated with senior management, in depth. Workers will receive a summary of the CIP and ongoing progress on completion
4. Any recommendations found throughout the audit will be communicated to senior management and to the workforce as it applies and/or affects their work
5. Any changes to the Health & Safety Management System will be communicated annually at spring training or throughout the year utilizing our HSE Bulletin issued with payroll
6. CIP reviews will be communicated during meetings and documented accordingly

#### **TRAINING:**

Competent Third Party Auditors will be trained through a formalized auditor training program. This qualification can be satisfied with the following a health and safety formal audit-specific training courses.

- OHSMS/OHSAS 18001:2007 Lead Auditor
- COR Essentials
- Basic Auditing Principles
- COR Internal Auditor
- Introduction to Hazard & Risk Management

A record of training that meets this requirement must be supplied prior to the start of the audit

#### **EVALUATION:**

- Once completed the Audit will be given to Senior Management to be reviewed in a meeting with the auditor, and any potential omissions, or inaccuracies are to be discussed prior to the Senior Management sign-off
- After final review of the audit, Senior Management, the Auditor, and members of the JHSC will meet to discuss the success of the HSMS and the audit itself
- Every audit will be dated for its start, and completion dates, as well as the approval (signing) date by Senior Management
- The CIP will be drafted by Senior Management, with assistance from the Auditor, and members of Management, as well as the JHSC
- The CIP will be dated as of the completion of the final draft, and will be re-dated after each respective quarterly review, and revision

- Should tasks in the CIP be assigned to employees, those employees will date and sign the completion of those tasks, which is then reviewed by Senior Management for compliance with the CIP, and final approval and sign-off
- Recommendations for program improvement derived from the audit results need to be considered when completing the Management Review, setting OHS Objectives, and developing the Continual Improvement Plan.

#### **FORMS/RECORDS:**

- Audit Plan
- COR Audit Tool Document
- COR Interview Questions
- COR Observation Questions
- WR Checklist
- Continual Improvement Plan Document
- Management Review Meeting Minutes

#### **REFERENCE MATERIALS:**

- Safety Groups Program Employer Guidelines
- Safety Groups Advantage Program Employer Requirements
- COR Audit Tool Document
- WSIB Work-Reintegration Policies
- COR Program Guidelines
- Company Standards/Policies and Procedures

Dated at \_\_\_\_\_ this \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_.

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Witness

\_\_\_\_\_  
Name & Title (please print)

\_\_\_\_\_  
Name

Continuous Improvement Review Tracking		
Date of Review/Change	Notes	Name of Reviewer