

## EXAMPLE AUDIT PLAN

**Audit Objective:** To audit conformance with requirements similar to those contained under *Section 4.2 – OH&S Policy* in the OHSAS 18001:2007 Standard.

**Audit Scope:** Audit covers only the Piping World facility at Blairsville, PA. The audit covers all employees (managers and staff) and all divisions.

**Audit Criteria:** The criteria to be used are shown in the table below.

### Audit Plan:

<b>Criteria</b>	<b>Objective Evidence to Be Collected</b>
<i>Top management shall authorize the organization's OH&amp;S policy.</i>	<p><b>Document:</b> Obtain Piping World's OH&amp;S policy; obtain Piping World's organization chart; determine if policy has been signed and dated by top management.</p> <p><b>Interview:</b> Interview CEO, Trudy Clarkson, to see if she can personally locate the OH&amp;S policy.</p>
<i>The policy is appropriate to the nature and magnitude of the organization's OH&amp;S hazards and risks.</i>	<p><b>Document:</b> Obtain a documented and official list of Piping World's OH&amp;S risks. Assess if there is "scale" or "magnitude" related to items contained on this list.</p> <p><b>Compare:</b> The items contained on this risk list with the policy and determine if the most important hazard and risk items are contained in or are consistent with Piping World's policy statement.</p>
<i>The policy includes a commitment to protection of workers, prevention of injury and ill health, and continual improvement in OH&amp;S management and OH&amp;S performance.</i>	<p><b>Document:</b> Obtain Piping World's OH&amp;S policy; determine if the policy <i>specifically</i> includes individual statements related to (1) a commitment to worker protection and prevention of injury and ill health; (2) a commitment to continual improvement in OH&amp;S management; and (3) a commitment to continual improvement of OH&amp;S performance.</p> <p><b>Interview:</b> Select four managers at random. Ask these managers to review the policy statement and ask them to determine if there is a framework (or clues) in the policy statement as to how Piping World will achieve these injury prevention and continual improvement/performance commitments.</p>
<i>The policy includes a commitment to at least comply with applicable legal/regulatory requirements and with other requirements to which the organization endorses that relate to OH&amp;S hazards and risks (e.g., corporate requirements).</i>	<p><b>Document:</b> Obtain Piping World's OH&amp;S policy; determine if there is a commitment to fully comply with legal requirements and with other requirements to which the organization subscribes, such as corporate requirements or conformance with consensus standards.</p> <p><b>Document and Compare:</b> Obtain a list of legal requirements that relate to OH&amp;S hazards at Piping World. Obtain a list of OH&amp;S hazards at Piping World (e.g., via a site-wide hazard assessment; job safety analyses); determine if the regulatory list is thorough, covering all of the OH&amp;S hazards/risks at Piping World; determine if the regulatory list contains many extraneous requirements not appropriate to the hazards/risks outlined.</p> <p><b>Document and Compare:</b> Obtain a list of non-regulatory requirements (e.g., consensus standards and corporate standards) that Piping World subscribes to in order to manage OH&amp;S hazards; determine if the requirements on the list matches the hazards that have been identified.</p> <p><b>Interview:</b> Ask the legal department if they are aware of any commitments in the policy statement for Piping World to comply with applicable legal requirements and with other requirements to which the organization subscribes that relate to OH&amp;S hazards and risks. Ask them to explain their role in overseeing or implementing these commitments.</p>

<b>Criteria</b>	<b>Objective Evidence to Be Collected</b>
<p><i>The policy provides the framework for setting and reviewing OH&amp;S goals and objectives.</i></p>	<p><b>Document:</b> Obtain Piping World’s OH&amp;S policy; determine if OH&amp;S goals and objectives can be established with the information provided; determine if the policy provides information as to how OH&amp;S goals and objectives are set and reviewed.</p> <p><b>Interview:</b> Select two managers reporting to the CEO. Ask them to read Piping World’s policy statement. After reading the policy statement, ask them if there is any framework evident in the policy statement that provides for the setting and reviewing of OH&amp;S goals and objectives. Ask them to elaborate with real-world examples at Piping World, especially using recent goals and objectives set for the organization (provide managers with list of goals and objectives if they do not have them on hand).</p> <p><b>Document:</b> Obtain a recent list of Piping World’s goals and objectives. Determine if they could feasibly be tiered off of the policy statement (look for common words and themes between the goals and objectives and policy statement).</p>
<p><i>The policy is documented, executed, and maintained.</i></p>	<p><b>Document:</b> Obtain Piping World’s current OH&amp;S policy; determine if there is a revision date on the policy statement.</p> <p><b>Document:</b> Obtain Piping World’s OH&amp;S policy that was in effect two years ago. Determine if it is the same as the current version. If they are the same:</p> <p><i>Interview:</i> Ask the safety and health manager if risks have changed in the last two years; have him/her elaborate; and if there are changes:</p> <p><i>Interview:</i> Ask CEO why the policy has not been maintained since OH&amp;S risks have changed.</p> <p><b>Interview and Inspect:</b> Ask five “floor” employees selected at random to explain how the Piping World’s policy is being implemented; ask them to provide concrete examples. If concrete examples are “visual,” inspect these examples and record the information.</p>
<p><i>The policy is communicated to all persons working for the organization with the intent that they are made aware of their individual OH&amp;S responsibilities.</i></p>	<p><b>Document and/or Records:</b> Obtain documented evidence (e.g., emails; meeting minutes) that the policy has been communicated to employees, including contractors.</p> <p><b>Interview:</b> Select 10 employees at random (including contractors). Ask them the following questions:</p> <ol style="list-style-type: none"> <li>1. Has the OH&amp;S policy been communicated to you? How? When?</li> <li>2. Can you provide/recite some of the most important components or requirements contained in this policy?</li> <li>3. Can you describe your individual OH&amp;S obligations that help implement the letter and spirit of this policy statement? (Most important question)</li> </ol>
<p><i>The policy is available to the public, including interested parties.</i></p>	<p><b>Documents and/or Records:</b> Obtain documented evidence that the policy has been communicated to the public and interested parties. How? Who? When?</p> <p><b>Interview, Obtain and Determine:</b> Ask CEO if there is a documented list as to the identities of Piping World’s interested parties. Obtain documented list if it exists. Determine if the policy statement is available to these parties.</p>
<p><i>The policy is reviewed periodically to ensure that it remains pertinent and appropriate to the organization and its needs.</i></p>	<p><b>Document:</b> Ask for documented evidence that policy has been reviewed periodically to ensure appropriateness and relevancy (e.g., minutes of meetings). Determine if this review has been conducted by higher level management (e.g., management review team).</p> <p><b>Document:</b> Ask for an approved document (procedure) outlining the processes for reviewing and changing the policy statement; determine if there are “triggers” that require changes in the policy statement.</p> <p><b>Document(s):</b> Ask for all previous versions of the policy statement issued in the last five years. Assess if there have been any changes to the policy.</p> <p><b>Interview:</b> Safety and health manager to determine if risks have changed in the last five years.</p> <p><b>Records:</b> Review OSHA logs and incident reports to determine if risks have changed in the last five years. If risks have changed in the last five years, determine if these changes are reflected in re-issued and appropriate policy statements.</p>

## **SAFETY, HEALTH, AND ENVIRONMENTAL (SHE) POLICY FOR TRI-ELECTRIC POWER COMPANY**



Tri-Electric Power Company's highest corporate value is ensuring the safety and health of our employees and the protection of the public and the environment. Tri-Electric Power Company will achieve safety, health, and environmental (SHE) excellence through manager commitment and employee participation.

We are committed to reducing our safety, health, and environmental impacts and to improving our safety, health, and environmental performance and systems by:

- Complying with corporate standards of SHE performance excellence, including using ISO 45001 and ISO 14001 consensus standards as the models for our SHE management systems.
- Assessing the hazards of our operations and reducing risk by applying a hierarchy of controls approach when technically and fiscally feasible.
- Assigning and enforcing SHE management system roles, responsibilities, and accountabilities throughout the organization—from senior managers down to line employees.

Tri-Electric Power Company will communicate its risks and hazards to employees and on-site contractors and seek their involvement in improving our SHE management systems. We will do this by holding forums to ask our employees and contractors as to what is working and what can be improved in the SHE-related processes and procedures that have been developed and implemented.

*Simon Olivier*

Dr. Simon Olivier, VP Production

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<b>Does the reviewed policy address the following requirements?</b>
Has a defined scope to the environmental or occupational health management system (it applies to)?
Has a commitment to prevention of injury and ill health?
Has a commitment to continual improvement of safety, health, and environmental (SHE) management systems and their performance?
Has a commitment to effective employee participation?
Has a commitment to conform to the organization's (self-imposed) SHE requirements?
Has a commitment to compliance with applicable SHE laws and regulations?
Is appropriate to the nature and scale of the organization's SHE risks?
Includes a commitment to the prevention of pollution?
Is signed (or has a place for signage by GM)?
Is a controlled document (revision number and date)?
Is to be implemented?
Is to be maintained (reviewed periodically to ensure it remains relevant and appropriate to the organization)?
Is to be communicated to all employees with intent that employees are made aware of individual SHE obligations?
Is available to interested parties, including the public and people working on behalf of the organization?
Provides a framework for setting and reviewing SHE goals, objectives, and targets?
Provides a framework for understanding the "SHE approach" to be used at the organization?

*Source: The criteria above are adapted from the policy section requirements of three management system consensus standards [OHSAS 18001, ANSI/AIHA Z10, and ISO 14001].*

Criterion	The policy conforms (C), partially conforms (PC), or does not conform (DNC) with the criterion	Indicate where the policy conforms or partially conforms with the criterion (cite specific sentences or phrases)	Indicate how you would change the policy to fully conform with the criterion (if the policy does not conform [DNC] or only partially conforms [PC] with the criterion)
Has a defined scope to the environmental or occupational health management system (it applies to)?			

### **SCENARIO 7.1**

You are working at a site that has authorized monies to construct a new office building. However, management is contracting out entirely the construction and design of this new facility. Top management desires that the contractor develop a Contractor EH&S Plan. The purpose of this plan is to manage “construction risk,” including protection of your own organization’s employees during construction. Management wants you to concentrate on the safety aspects of the construction activities to be conducted—not on the actual design of the facility itself.

You are being instructed to draft the section of the contract (contract language) that outlines the requirements/information to be included in this Contractor EH&S Plan, which the contractor will generate as a contract deliverable. In essence, the purpose of this Contractor EH&S Plan is to contain upfront information that you want to receive from the Contractor to ensure that activities are going to be conducted safely and to outline those contractor processes that would be implemented at your site to ensure the safety of your workers as well as the contractors. For instance, you might ask them for training records and maintenance records on equipment. You might ask them how they will dispose of hazardous wastes and store chemicals at your site. You might ask them how they handle a medical emergency or inform you of an OSHA recordable incident.

You are to provide what is to be included in the contract in terms of the contents/requirements to be contained in this Contractor EH&S Plan. You are to generate the contract language that you would recommend. The task is not to generate the Contractor EH&S Plan itself, but rather to provide the contract language so the contractor knows what to include in the plan.

## **SCENARIO 7.2**

Management also wants you to write EH&S contract “boilerplate” language to place in the solicitation for this construction activity. This boilerplate can include things such as:

- how the funding (your) organization will evaluate contractor proposals received based on EH&S criteria (that you need to establish)
- how EH&S aspects of the contract will be managed by the funding organization after contract award (basically outlining your organization’s role in managing the EH&S aspects of the contractor activities)
- the regulatory requirements that will need to be met by the contractor organization
- the “DOs” regarding what the contractor has to do (e.g., provide to you SDS sheets for chemicals they bring onto the site) and what the contractor cannot do (“DON’Ts”) without your approval (e.g., shut off utilities; impair a fire protection system); basically, you are writing a list of requirements that would be enforceable by the contracting organization when the contractor is building the office building
- any indemnification clauses