



CERTIFICATE OF RECOGNITION AUDIT EQUIVALENCY (PASE) PROGRAM

Effective Date: 2019 - 01 - 01

Owned by: Safety Audits and Certification Department

Approval: _____

Approved By: Justin Degagne, SA&C Acting Manager

Valid Until: 2021 - 01 - 01

Sensitivity Level: Public

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SUMMARY OF CHANGES

This Summary shows:

- All changes from last approved and published document
- The location within the document where the changes have been made

| Location of Change | Summary of Change |
|--------------------|--|
| Entire Document | This is the first revision of the COR Audit Equivalency (PASE) Program. This revision brings the Procedure template into alignment with the templates used by the Governing Documents Framework. |
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 Requirements changed in the new revision will be identified with a revision triangle beside it.

SUMMARY OF REVIEWERS

The following people were involved in the review of this Procedure.

| Name | Position |
|----------------|--|
| Justin Degagne | Acting Manager, Safety Audits and Certifications |
| SA&C Team | Subject Matter Experts (SME) |
| | |

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1.0 ABOUT THIS PROCEDURE

1.1 Purpose and Direction

Large employers with mature health and safety management systems may also have a well-established internal audit system. These employers may be eligible for a COR Audit Equivalency Program (known in Alberta as the Partnerships Audit Standard Equivalency or PASE). The PASE program allows employers to use their existing (or slightly modified) internal audit systems in place of the standard Energy Safety Canada COR audit instrument and process. Entrance into the PASE program is subject to approval from both Energy Safety Canada and the applicable governing bodies.

Energy Safety Canada Reference: SAC-MNL-001
Alberta Government Reference: 1.6

1.2 Scope

The PASE program allows large employers with a mature health and safety management systems to participate in and demonstrate leadership in the COR program without the need to duplicate audit systems and processes.

1.3 Target Audience

The target audience for this document is all Energy Safety Canada personnel in any work location. This includes Employers and Auditors.

2.0 PROCEDURE

2.1 Pre-approval phase:

- 2.1.1 Employers must meet the established criteria to be considered for this program, including;
- 500 hundred employees
 - An auditing process which includes a three-year certification cycle
 - Successful use of their corporate health and safety audit system for a minimum of three **consecutive** years
 - The required use of documentation, interview, and observation validation techniques in their corporate health and safety audit system
 -
- 2.1.2 Employers must submit a formal application by March 31st for participation in the PASE program that calendar year([Appendix 3.13.1](#) and [3.13.2: PASE Application and Gap Analysis](#)).

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- 2.1.3 The application is reviewed to determine both the maturity of their health and safety management system as well as its alignment with COR standards and audit processes, including:
- A description of the operation and the organizational chart
 - The use of Energy Safety Canada certified auditors or corporate auditors who have been approved in full alignment with [SAC-PRO-045 Use of Corporate Auditors](#)
 - That representative interview and work site sampling in their audit instrument meets minimum Partnerships standards
 - The employers audit plan and full audit cycle, including the interview and work site sampling plan (see below for audit cycle standards).
 - The audit process, including the documentation of auditor notes and scoring methodology.
 - A proposal for the transfer of audit scoring from the employer's audit instrument to Energy Safety Canada's PASE gap analysis.

2.2 Gap Analysis phase:

- 2.2.1 If an employer is accepted for consideration in the PASE program, Energy Safety Canada will complete an initial gap analysis between their audit system and the applicable governing bodies' audit standard. This is to identify what topics in the Partnership audit standard are covered by the corporate audit questions.
- 2.2.2 The employer has until May 31 to provide any additional information to clarify any deficiencies identified through the gap analysis review.
- 2.2.3 Energy Safety Canada, with input from the applicable governing body, will complete the review by June 30 of the year in which an employer is seeking COR certification.
- 2.2.4 A fee will be applied for the gap analysis review.
- 2.2.5 Once approved, the transfer of audit scoring from the employer's audit instrument to Energy Safety Canada's PASE gap analysis remains in place for subsequent audits unless there are significant changes in either the employer's audit instrument, or the applicable governing bodies' audit standards. If there are significant changes, the employer would need to have a new gap analysis completed.
- 2.2.6 In those cases where an employer adjusts their corporate audit instrument to address an identified gap, the individual site audits that were already completed using the deficient version of the audit instrument would need to have their scoring adjusted for the deficient questions and the question included as part of the employer's final PASE gap analysis. This would only apply to the current audit cycle

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2.3 Final PASE Report phase:

- 2.3.1 Audit scoring will be based on the previously approved proposal for the transfer of audit scoring.
- The employer must use an approved Energy Safety Canada PASE auditor to interpret and transfer audit results from the employer's audit instrument to the Energy Safety Canada's PASE gap analysis.
 - Energy Safety Canada shall maintain a list of Energy Safety Canada certified auditors who are approved to conduct PASE audits.
- 2.3.2 Where an employer conducts multiple audits during their annual audit cycle, the following standards apply to the audit cycle:
- The "audit date" will be the last day of on-site information gathering activities for the last audit conducted for the final PASE gap analysis submission.
 - Only audits started and completed in the previous 12-month period to the audit date are eligible for inclusion for transfer to the gap analysis.
 - The cycle of work site sampling must adhere to the audit plan established in the application process.
 - Any audits used in a given annual audit cycle may not be re-applied to a subsequent audit cycle.
- 2.3.3 The final PASE gap analysis report, with completed scoring transfer, must be submitted to Energy Safety Canada within 60 days of the last day of on-site data gathering as defined in [2.3.2](#) above.
- 2.3.4 The final PASE gap analysis report must include:
- Auditor notes to justify the scoring for each question.
 - List of work sites covered, on-site information gathering dates for each, and interview sampling details from each site.
- 2.3.5 Energy Safety Canada shall perform a quality assurance review of the final PASE gap analysis report based on the agreed upon scoring transfer and the above standards.
- 2.3.6 A minimum audit score of 80% overall and 60% for each element is required for the employer to be eligible for COR certification.
- 2.3.7 Employers in the PASE program may perform an action plan in lieu of a maintenance audit to meet their COR maintenance requirements for the two years following the PASE audit.
- Employers in the PASE program are exempt from the requirement that an employer must complete a full three-year COR cycle to be eligible for an action plan in lieu of a maintenance audit.

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3.0 ROLES AND RESPONSIBILITIES

| | |
|-----------------------------|--|
| PASE Auditor | <ul style="list-style-type: none">• Review SAC-PRO-039: Outline of Roles and Responsibilities, to ensure compliance with Energy Safety Canada’s program requirements• Be available to conduct the audit in its entirety• Interpret and transfer audit results from the employer’s audit instrument to the Energy Safety Canada’s PASE gap analysis |
| Employer | <ul style="list-style-type: none">• Review SAC-PRO-039: Outline of Roles and Responsibilities, to ensure compliance with Energy Safety Canada’s program requirements• Have an active health and safety management system in place• Submit a formal application to use the PASE program• Provide any additional gap analysis information |
| Energy Safety Canada | <ul style="list-style-type: none">• Perform an initial gap analysis• Maintain a list of Energy Safety Canada certified auditors who are approved to conduct PASE audits• Perform a quality assurance review of the final PASE gap analysis report |

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