



ON SITE AUDIT REVIEW

Effective Date: 2019 - 01 - 31
Owned by: Safety Audits and Certification Department

Approval: _____
Approved By: Justin Degagne, SA&C Acting Manager

Valid Until: 2022 - 01 - 31


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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 |
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| Entire Document | This is the first revision of the On Site Audit Review Procedure. 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

This procedure defines the process of On Site Audit Review (OSAR). An OSAR is conducted to validate the key findings of Energy Safety Canada certified auditors and ensure appropriate audit process was followed.

Energy Safety Canada Reference: SAC-MNL-001, SAC-MNL-003, SAC-PRO-069, SAC-CFT-006, SAC-CFT-010, SAC-CFT-011 and SAC-CFT-012

Alberta Government Reference: Standard 2.8

1.2 Scope

OSARs are intended to validate auditor results and the audit processes. They are not a re-audit of the employer's health and safety management system.

OSARs are completed by either the provincial governing body or by a representative of Energy Safety Canada to verify the work of auditors conducting certification and maintenance audits.

1.3 Target Audience

The target audience for this document is all Energy Safety Canada personnel in any work location. This includes employers, auditors and applicable governing bodies.

2.0 PROCEDURE

2.1 OSAR selection will be based on any of the following criteria:

2.1.1 Where Energy Safety Canada initiates and administrates the OSAR process, a minimum of 10% of the total number of Energy Safety Canada certified external auditors will be subject to an OSAR within a given calendar year. This does not preclude the inclusion of internal auditors in addition to this sample size.

2.1.2 Auditor selection for the OSAR sample shall be based on the following guidelines:

- A mixture of the following:
 - high and low volume auditors
 - new and experienced auditors
 - audits covering a variety of employer sizes
 - audits conducted during different times of the year
 - provincial jurisdiction
 - certification and maintenance audits
- As a part of an investigation arising from concerns about the auditor's work or a complaint from an employer
- An auditor who has recently been recertified following a suspension
- At the request of Energy Safety Canada or the governing body when audit quality issues have been identified or are suspected

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- 2.2** In Alberta, the OSAR process is initiated and administered by the governing body (Partnerships) and, in consultation with Energy Safety Canada, shall select the auditors to be sampled each year.
- 2.2.1 Outside of Alberta, the OSAR process is initiated and administered by Energy Safety Canada.
- 2.3** OSARs should be conducted no more than 120 days after the last day of onsite activities were completed by the auditor.
- 2.4** The OSAR will focus on the following key areas:
- Were interviews conducted on a representative sample of the employer's workforce?
 - Were site observations performed at all sites identified in the audit report?
 - Did the auditor complete all critical audit steps?
 - Does a review of key documentation validate the original auditor's findings?
 - Do observations (if applicable) validate the original auditor's findings?
- 2.5** Employers whose audits are selected as a part of the OSAR sample are required to participate in the process.
- 2.5.1 Energy Safety Canada or the governing body will advise the audited employer (in writing) that their audit was selected for OSAR.
- 2.5.2 An employer may be required to work with Energy Safety Canada or the governing body to correct any systemic deficiencies identified with their health and safety management system ([see subsection 2.7](#)).
- 2.5.3 Energy Safety Canada may choose to initiate an investigation based on the number of deficiencies identified during the OSAR.
- 2.5.4 Should extenuating circumstances prevent a sampled employer from participating in the process, the employer must provide Energy Safety Canada or the governing body with written justification for their exclusion within seven days of their notification.
- 2.5.5 If an employer fails to cooperate with the OSAR process their COR may be cancelled by the governing body.
- 2.6** In Alberta, Partnerships will provide feedback on OSAR results.
- 2.6.1 OSAR Reviewers will provide verbal feedback to the employer while on-site.
- 2.6.2 OSAR Reviewers will provide the employer with an email summary of the feedback provided in [subsection 2.6.1](#) within 14 days of completion of OSAR data gathering activities (unless [Section 2.7](#) is applicable). A copy is provided to Energy Safety Canada to be kept with the auditor's records.

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- 2.6.3 Alberta Partnerships will provide a formal Auditor Feedback Letter to Energy Safety Canada who must then forward it and the full OSAR Report to the auditor within 30 days.
- 2.7** Should the OSAR reveal systemic deficiencies in the employer's Occupational Health and Safety Management System that were not identified by the original auditor, the following actions will be taken:
- 2.7.1 Energy Safety Canada or the governing body will provide the employer with a written report outlining systemic deficiencies within 14 days of completion of OSAR data gathering activities.
- 2.7.2 Alberta Partnerships will refer the employer to the Employer Review process ([SAC-PRO-069](#)).
- Alberta Partnerships will request that Energy Safety Canada assists the employer to correct the deficiencies.
- 2.8** Where systemic deficiencies are identified with the auditor's performance or processes, Energy Safety Canada may initiate disciplinary action with the auditor ([SAC-MNL-003](#)).
- 2.8.1 Energy Safety Canada may also prohibit the auditor from conducting the next certification audit for the employer.
- 2.8.2 Energy Safety Canada must provide the governing body with details of any follow-up investigations and/or disciplinary actions undertaken with the auditor as a result of an OSAR within 120 days of receipt of the OSAR Report.
- 2.8.3 If the matter is still in progress at 120 days, an update is required and when concluded, a final report of the actions undertaken must be provided.
- 2.9** Energy Safety Canada approved OSAR reviewers must meet the following minimum criteria:
- 2.9.1 Be certified Energy Safety Canada auditor.
- 2.9.2 Sign and abide by the Energy Safety Canada Audit Reviewer Code of Ethics ([SAC-CFT-006](#) and [SAC-CFT-012](#)) in order to avoid any conflict of interest, and to ensure confidentiality of the process.
- 2.9.3 Be trained on the OSAR process.
- 2.9.4 In jurisdictions where Energy Safety Canada administrates the OSAR process, OSAR reviewers may be comprised of:
- Qualified Energy Safety Canada staff, or
 - Consultant external auditors on behalf of Energy Safety Canada

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| <p>Energy Safety Canada</p> | <ul style="list-style-type: none"> ○ Provides feedback to the governing body on the suitability of OSAR reviewer candidates ○ Provides timely updates on audits received to facilitate the auditor/audit selection process ○ Provides the names of auditors with possible performance-related issues as part of the auditor selection process ○ Provides the OSAR reviewer with the original audit report upon request ○ Provides the auditor with the OSAR results ○ As required, initiates an investigation when auditor performance issues are identified ○ As required, works with employer to address deficiencies identified with their health and safety management systems ○ Shares relevant OSAR findings with governing bodies |
| <p>Employers</p> | <ul style="list-style-type: none"> ○ Aids the OSAR reviewer to have all requested documentation available at the time of the review ○ Cooperate with the OSAR process ○ Correct any deficiencies identified in a timely manner as a result of findings in the OSAR process |
| <p>OSAR Reviewer</p> | <ul style="list-style-type: none"> ○ Confirms they are not in a conflict of interest in reviewing the selected auditor ○ Contacts the employer to set a date for the OSAR ○ Requests the original audit report from Energy Safety Canada prior to completing on-site information gathering activities ○ Performs the on-site review using Energy Safety Canada's OSAR protocol (SAC-CFT-011 or SAC-CFT-012) ○ Provides the governing body with a completed OSAR report within 14 days of on-site information gathering |

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