

Strategies for Effective Internal Health and Safety Auditing

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Outline

- Overview of Auditing Fundamentals
 - Audit Benefits
- Considerations in Audit Planning
 - Purpose, Scope, Criteria
- The Audit Process
- Results and Reporting



What is a Health and Safety Audit?

- A methodical approach conducted by an objective auditor or audit team to evaluate operations against defined criteria or standards, and report on findings.



Audit vs. Inspection

	Audit	Inspection
Purpose	Comprehensive, systematic evaluation of a management system to evaluate effectiveness	Review of a physical environment, equipment or process. Find and fix health and safety issues.
Scope	More comprehensive, includes policies, programs, training.	Limited to specific area or department. Focused on a defined safety measure or operation
Frequency	Less frequent. Often annual or at other prescribed frequency.	Routine, conducted on a continual basis (daily, weekly, monthly)
Techniques	Conducted following a structured procedure. Assesses effectiveness of programs. Uses evidence to verify compliance.	Visual inspection of the environment, equipment, or process.



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Electromark

EYE WASH / SHOWER INSPECTION RECORD

Equipment ID *Eye Wash*
Location *Site Shipping*
Test *OK*

Date	Initials	Comments
1/8	TC	OK
3/5	TC	OK
3/7	TC	OK
4/13	DF	OK
5/16	TC	OK
6/19	DF	OK
7/20	TC	OK
8/3	CP	OK
9/5	AP	OK
10/8	TC	OK
11/4	CP	OK

Health and Safety Audit Benefits

- **PROACTIVE** approach to reduction of health and safety hazards and risks
- Provide a measurement of the current system status
- Improve compliance and reduce risk of fines or other regulatory actions
- Increase understanding of H&S requirements
- Reduce costs due to improved safety and/or efficiency
- Prioritize resources
- Improve employee participation and/or morale
- Promote H&S culture and image by demonstrating commitment to improvement



Audit Process



Audit Purpose, Scope and Criteria



Audit Objectives

“What is the purpose of the audit?”

☐ Evaluate status of:

- Compliance with EHS regulations and other standards
- Conformance with best management practices or management system specifications
- Risk management
- Other performance aspect(s)

☐ Identify opportunities to improve compliance, conformance or performance

☐ Meet internal and/or external requirement

☐ Demonstrate management of EHS obligations



Determining the Scope

What is being audited?



- Level of review (Site? Corporate?)
- Operations to include?
- Programs to include?
- Period under review?
- Duration/level of effort?

Audit Criteria

“To what requirements are we auditing against?”

The audit criteria may include one or more of the following:



Laws and Regulations

Consensus or Industry Standards

Corporate Policies and Standards

Site or Other Work Procedures

Best Management Practices

Understanding Audit Criteria

A deep understanding of the *requirements and application of the criteria* is needed.

- Written program requirements
- Training requirements
- Management systems in place
- Best management practices



Audit Activities



Planning Considerations

- Auditor health and safety
- Site access and scheduling
- Communications
- Confidentiality/security
- Coordination
- Reporting process



Pre-Audit Activities

Depending on the project scope, pre-audit activities may include:

- Project kick-off call
- Audit plan development and communication
- Pre-audit questionnaire
- Document request and review
 - High level review of maturity of the program
- Development of initial lines of questioning and verification testing plan



Onsite Activities

- Introduction/briefing
- Site tour



- Gathering evidence
 - Interviews
 - Document review
 - Verification testing
- Closing meeting

Gathering Audit Evidence

- Select types of evidence needed and methods for gathering them
- Compare practices against requirements (audit criteria)
- Document findings



Audit Evidence

- ✓ Collect objective evidence based on scope and assignment.
- ✓ Evaluate audit evidence, comparing conditions and practices against requirements (audit criteria).
- ✓ Documents, records, interviews, surveys, inspections



Tips for Effective Interviews

- Clear explanation of audit objectives and process
- Prepare questions based on scope and assignment
- Avoid leading questions
- Do not communicate incomplete or unsubstantiated findings
- Stick to interview focus and schedule
- Always be respectful with tone, body language and active listening

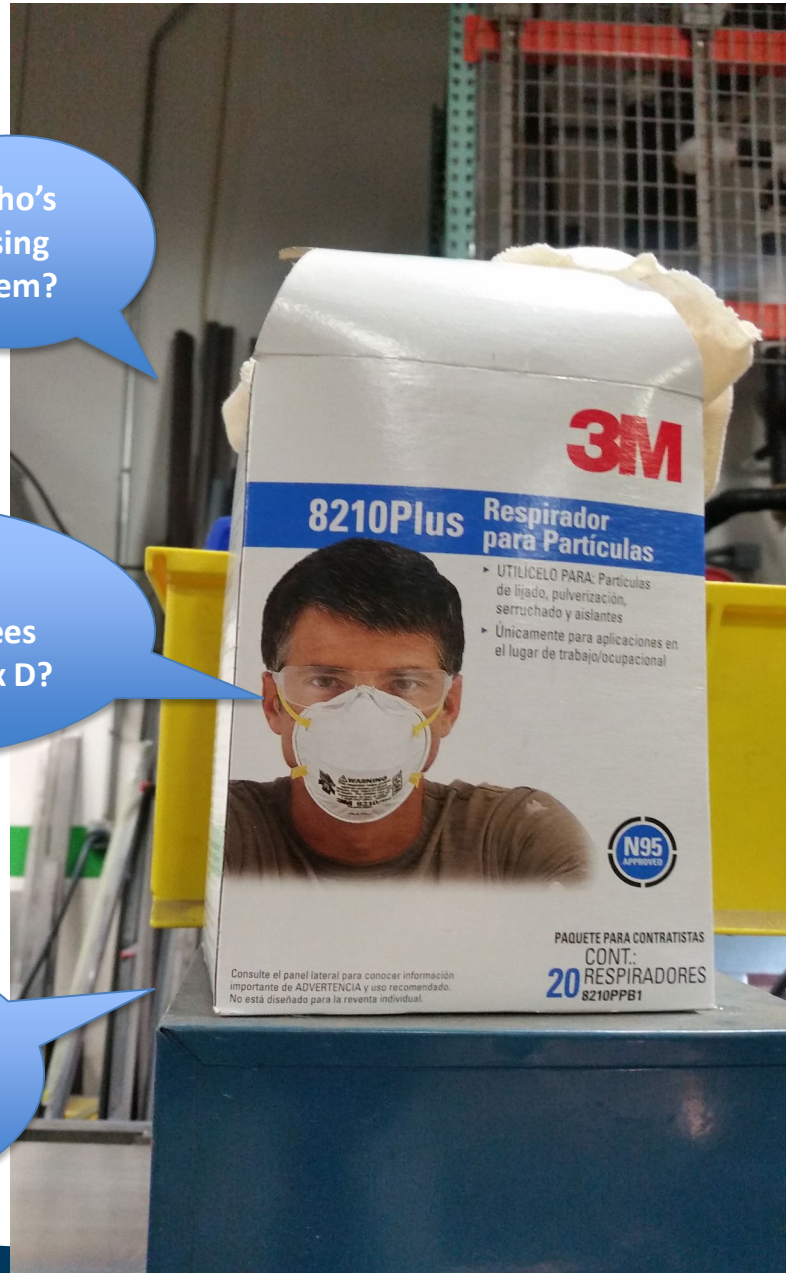




Who's
using
them?

Are they used
voluntarily?
If so, are employees
provided Appendix D?

If required, are
other program
elements in
place?



What are
they used
for?

How is access
controlled?

What are the
airborne
contaminant(s)
and level(s)?

Audit Evidence Example

To assess compliance with OSHA's requirement for fit-testing of tight-fitting respirator users at least annually at a foundry with 50 employees listed as authorized respirator users. Several instances of improper use (over a beard, N95 strap dangling) or improper storage observed during site walkthrough.

Sampling Strategy:

Collect names of employees observed wearing respirators.

Compare against list of authorized respirator users.

Request that the client provide date of training and fit-testing record for each employee in the sample.

Audit Evidence: Example

For a compliance audit of the OSHA Hazard Communication standard, what strategy would you use to collect objective evidence and verify compliance or non-compliance?



- What do you see?
- What questions do you have?
- Is there a regulatory finding?
- *Why/why not?*





- Standard violation?
- Written program requirement?
- Training requirement?

Audit Evidence: Example

For a compliance audit of the OSHA Control of Hazardous Energy standard, what evidence would you collect to verify compliance or non-compliance?



LOCKOUT / TAGOUT FORM

To be completed in full prior to LOCKOUT/TAGOUT

Date: 3-21-22 Department: [Redacted]
Equipment requiring Lockout/Tagout: Co [Redacted]

Names Job Title of Authorized Employees: (If more than 1 the first name will assume leadership role)

[Redacted] Title: Operator
Title: _____

Names Job Title of Effected Employees:

[Redacted] Title: Operator
Title: _____
Title: _____
Title: _____

Types and Magnitude(s) of energy and hazards:

Natural gas and 120VAC.

(examples: 480v three phase; 120v single phase; compressed air - 110psi)

Types and location of energy isolating devices:

Lock #4 on disconnect
Lock #1 on Gas valve

(example: locks; hasps; plug boots; valve clamshell; chain with lock; etc.)

Signatures of Authorized Employee(s)

Dept Mgr or Supervisor: (Not present) Date: _____

Maintenance: [Redacted] Date: 3-21-22

EHSMS Team/Security Mgr: (Not present) Date: _____

[Redacted]

Started at 5:40 am, finished at 5:55 a.m.
Unlocked gas and electric [Redacted]





Reporting Audit Findings



Purpose of Reporting and Documentation

- Communication of results
- Action planning
- Prioritization of resources
- Assignment of responsibilities

Audit Report



Scope



Audit Methods



Findings




Recommendations

Report Writing

- Common format:

Requirement	What does the criteria require?
Applicability	How does it apply (to client, site, department, area) and current status?
Finding Statement	What is the issue in meeting the requirement, or opportunity for improvement?
Citation	What is the regulatory or other reference?
Recommendation	What are the recommended corrective or preventive actions, considering potential root cause(s) for systemic issues?

Recommendations and Corrective Actions

- These are the heart of the audit process.
 - What do we need to do?
 - How do we do it?
- Pros/Cons of metrics (# findings) 
- Pros/Cons of assigning priorities
- Corrective Actions: focus on tracking from completion through verification.

Common Findings

- Written programs
 - Programs are written but findings indicate that program requirements are not fully implemented
 - Written programs do not address all compliance elements
- Systemic noncompliance resulting from a lack of management system in place.
 - Ex. Machine guarding
- Training
 - Informal training with no record of content.
 - Formal training that does not meet the content requirements of a standard
 - Retraining/additional training is not implemented when requirement is triggered. Ex. HazComm, LOTO

Summary

Keys to a Successful Audit

- Preplanning
- Criteria clearly defined
- Scope clearly defined
- Participants on board
- Knowledgeable auditors
- Findings are documented and tracked



Questions or Comments?

Thank you!

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