

OT/02

OHS Audit Process Booklet

1. Purpose:

The purpose of this document is to set out ATC INTERNATIONAL 's policy regarding to process of audit of OHS management system.

2. Scope:

Apply for all OHS audit and certification process.

3. Reference:

IAF MD 22

4. Definition:

legal compliance: Conformity with the law, in such a way that the intended outcome is realized

5. Procedure

5.1. Pre-certification Activities

The authorized representative of the applicant shall complete P 17/18 and App reviewer shall check it. App reviewer shall review P20/06 second sheet and see all clauses that determined in Time Calc sheet. it is not possible to ask all the question from applicant but App reviewer shall check the company website and information and also process based on the sector and if needed contact to them and ask related needed question and fill out the needed. If the client provides services at another organization's premises, App reviewer shall verify that the client's OHS covers these offsite activities (notwithstanding the OHS obligations of the other organization). In determining the time to be spent for audit, App reviewer shall consider to audit periodically any organization site where these employees work. so it is responsibility of app reviewer to explain this matter in Explanation section in Time Cal sheet. Whether all sites shall be audited will depend on various factors such as OHS risks associated with the activities therein performed, contract agreements, being certified by another accredited CB, internal audit system, statistics on accidents and near misses. The justification for such decision shall be recorded in explanation section. In the case of OHS operated over multiple sites it is necessary to establish if sampling is permitted or not based on the evaluation of the level of OHS risks associated to the nature of activities and processes carried out in each site included in the scope of certification. The rationale of such decisions, the calculation of the audit time and the frequency of visiting each site shall be consistent with the requirements Procedure 17 and 35 and shall be documented for each client in P20/06. Where there are multiple sites not covering the same activities, processes and OHS risks, sampling is not appropriate as also mentioned in Procedure 35.

Although a site performs similar processes or manufactures similar products to other sites, App reviewer shall take account of the differences between the operations of each site (technology, equipment, quantities of hazardous materials used and stored, working environment, premises etc.). When sampling is permitted App reviewer shall ensure that the sample of sites to be audited is representative of processes, activities and OHS risks that exist in the organization to be audited. Temporary sites covered by the organization's OHS are subject to audit on a sample basis to provide evidence of the operation and effectiveness of the management system

Temporary sites could range from major project management sites to minor service/installation sites. The need to visit such sites and the extent of sampling shall be based on an evaluation of the risks of failure of the OHS management system to control OHS risks associated with the client's operations. Sites included in sampling should represent the client's scope of certification, sizes and types of activities and processes, type of hazards involved and associated OHS risks, and stages of projects in progress.

Typically, on-site audits of temporary sites would be performed. However, the following methods could be considered as alternatives to replace only those parts of on-site audits not related to witness the operational control and other OHS management system activities:

- i) interviews or progress meetings with the client and/or its customers in person or teleconference,
- ii) document review of temporary site activities,
- iii) remote access to electronic site(s) that contain records or other information that is relevant to the assessment of the OHS management system and the temporary site(s),
- iv) use of video and teleconference and other technology that enable effective auditing to be conducted remotely.

It should be noted that if the company have temporary site such as construction of building company, the App reviewer shall click on Operations at temporary sites section and put on YES. in this section, automatically 5% will be add to audit time.

5.2. Planning Activities

Legal compliance:

While certification of an OHSMS against the requirements of the applicable OHSMS standard is not a guarantee of legal compliance (neither is any other means of control, including government or other type of control and/or legal compliance inspections or other forms of certification or verification), it is a proven and efficient tool to achieve and maintain such legal compliance.

It is recognized that accredited OHSMS certification shall demonstrate that an independent third-party has evaluated and confirmed that the organization has a demonstrably effective OHSMS to ensure the fulfilment of its policy commitments including legal compliance.

Ongoing or potential non-compliances with the applicable legal requirements might show a lack of management control within the organization and its OHSMS and the conformity with the standard should be carefully reviewed.

Through the certification assessment process, a Certification Body shall evaluate an organisation's conformity with the requirements of an OHSMS standard as they relate to legal compliance and shall not grant certification until conformity with these requirements can be demonstrated.

After certification, the subsequent surveillance and reassessment audits conducted by the Certification Body shall be consistent with the above audit methodology.

With respect to the balance between review of documents and records and the evaluation of the OHSMS implementation during operational activities (e.g. tour of facilities and other work sites), the Certification Body shall ensure that an adequate audit of the effectiveness of the OHSMS is undertaken.

There is no formula to define what the relative proportions should be, as the situation is different in every organisation. However, there are some indications that too much of the audit time being dedicated to an office-based review is a problem that occurs with some frequency. This could lead to an inadequate assessment of the effectiveness of the OHSMS with respect to legal compliance issues, and potentially to poor performance being overlooked, leading to a loss of stakeholder confidence in the certification process.

HOC shall, through an appropriate surveillance program, assure that conformity is being maintained during the certification cycle, normally three years. ATC INTERNATIONAL auditors shall verify the management of legal compliance based on the demonstrated implementation of the system and not rely only on planned or expected results.

Any organization failing to demonstrate their initial or ongoing commitment to legal compliance, shall not be certified or continued to be certified as meeting the requirements of an OHSMS standard by Final reviewer.

Deliberate or consistent non-compliance shall be considered a serious failure to support the policy commitment to achieving legal compliance and shall preclude certification or cause an existing OHSMS standard certificate to be suspended, or withdrawn.

It is responsibility of the auditors to attention about this issue in each stage of the audit.

If the facilities and work areas are subject to closure the OHS risks change, as there may no longer be the same risks to employees, but there may be new risks applicable to members of the public (e.g. in case of lack of suitable maintenance and surveillance activities). it is responsibility of the auditors to verify that the management system continues to meet the OHSMS standard and to be effectively implemented in respect of the closed facilities and work areas, and, if not, HOC shall suspend the certificate.

The organisation shall be able to demonstrate that it has achieved compliance with the legal OHS requirements that are applicable to it through its own evaluation of compliance prior to the Certification Body granting certification.

Where the organization may not be in legal compliance, it shall be able to demonstrate it has activated an implementation plan to achieve full compliance within a declared date, supported by a documented agreement with the regulator, wherever possible for the different national conditions. The successful implementation of this plan shall be considered as a priority within the OHSMS.

Exceptionally the Certification Body may still grant certification but shall seek objective evidence to confirm that the organization's OHSMS:

a. is capable of achieving the required compliance through full implementation of the above implementation plan within the due date.

b. has addressed all hazards and OHS risks to workers and other exposed personnel and that there are no activities, processes or situations that can or will lead to a serious injury and/or ill-health, and
c. during the transitional period has put in place the necessary actions to ensure that the OH&S risk is reduced and controlled.

this conformance shall be submitted in summary section of Efile.

It is responsibility of Final reviewers and HOC to check it regularly.

5.3. Conducting Audit:

The audit team shall interview the following personnel:

- i) the management with legal responsibility for Occupational Health and Safety,
 - ii) employees' representative(s) with responsibility for Occupational Health and Safety,
 - iii) personnel responsible for monitoring employees' health, for example, doctors and nurses.
- Justifications in case of interviews conducted remotely shall be recorded,
- iv) managers and permanent and temporary employees.

Other personnel that should be considered for interview are:

- i) managers and employees performing activities related to the prevention of Occupational Health and Safety risks, and
- ii) contractors' management and employees.

It is duty of auditors to do it.

Based on procedure 17 and also auditor handbook the actions to be taken in the event that it discovers a non-compliance with relevant regulatory requirements the auditor shall issue Major non conformity if it would be serious breach and submit in Audit finding Form P17/01 and the client shall do immediately action to remove it.

The organization representative shall be requested by Lead auditor to invite the management legally responsible for occupational health and safety, personnel responsible for monitoring employees' health

and the employees' representative(s) with responsibility for occupational health and safety to attend the closing meeting. Justification in case of absence shall be recorded in summary section.

5.4. Maintaining Certification:

Independently from the involvement of the competent regulatory authority, a special audit may be necessary in the event that the Certification Body becomes aware that there has been a serious incident related to occupational health and safety, for example, a serious accident, or a serious breach of regulation, in order to investigate if the management system has not been compromised and did function effectively. HOC shall document the outcome of its investigation.

It should be reported to ATC INTERNATIONAL by the client, immediately based on Scheme rules (Work instruction 08)

Information on incidents such as a serious accident, or a serious breach of regulation necessitating the involvement of the competent regulatory authority, provided by the certified client or directly gathered by the audit team during the special audit, shall provide grounds for ATC INTERNATIONAL to decide on the actions to be taken, including a suspension or withdrawal of the certification, in cases where it can be demonstrated that the system seriously failed to meet the OHS certification requirements. Such requirements considered in scheme rules (Work instruction 08) as part of agreement.

5.5. Audit Man/day determination:

Calculation of the Effective Number of Personnel:

The effective number of personnel is used as a basis for the calculation of audit time for OHSMS. Considerations for determining the effective number of employees include part-time personnel, those working on shifts, administrative and all categories of office staff, and similar or repetitive processes. In case of seasonal operations (e.g. harvesting activities, holiday villages and hotels, etc.) the calculation of the effective number of personnel shall be based on the personnel typically present in peak season operations." Reductions due to employment of large numbers of unskilled personnel shall not be made without consideration of the associated risk

Similar or repetitive processes within scope

a) When a high percentage of personnel perform certain activities/positions that are considered similar or identical because they expose personnel to similar OHS risks (e.g. cleaners, security, sales, call centres, etc.) a reduction in the number of personnel which is coherent and consistently applied on a company to company basis within the scope of certification may be permitted.

b) For groups of workers performing repetitive jobs which can reduce attention, and raise the associated level of OHS risk (e.g. mounting, assembling, packaging, sorting, etc.), the methods incorporated for possible reductions shall be documented to include the assessment of the OH&S risk of any activities/positions of workers.

Shift work employees

The timing of the audit which will best assess the effective implementation of the OHSMS for the full scope of the client activities, including the need to audit outside normal working hours and various shift patterns. This shall be agreed with the client based on procedure 17.

Temporary unskilled personnel

This issue normally only applies in countries with a low level of technology where temporary unskilled personnel may be employed in considerable numbers to replace automated processes. Under these circumstances, a reduction in effective personnel may be made for other certification schemes (QMS, EMS). This reduction is in principle to be regarded as not applicable to OHSMS since the employment of temporary unskilled personnel can be a source of OH&S risks. If, in exceptional cases, a reduction is made the justification for doing so shall be recorded in Form P20/06 and made available to the AB at assessment. All of the above things considered in Form P20/06 calculation.

5.6. METHODOLOGY FOR DETERMINING AUDIT TIME OF OHSMS

It is done based on Procedure No 17 and 15.

5.7 FACTORS FOR ADJUSTMENTS OF AUDIT TIME OF OHSMS and AUDIT TIME OF A MULTI-SITE OHSMS

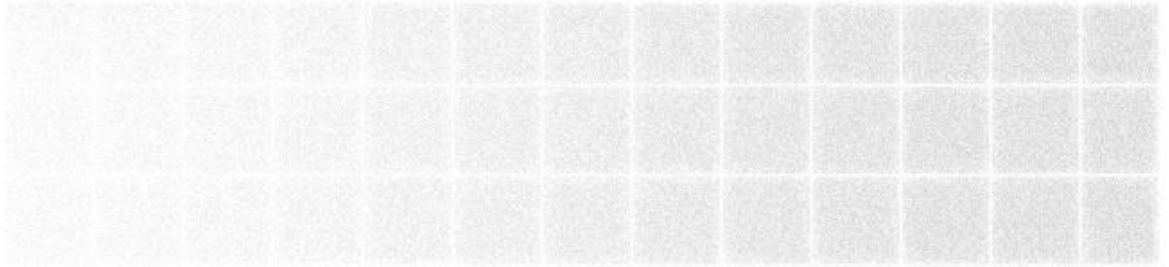
The factors that can increase or reduce audit man time completely defined in Form P20/06 "Time Cal" sheet and App reviewer shall decide based on the factors that determined.

For multiple site it will done based on Procedure NO 35.

5.8. CONTROL OF EXTERNALLY PROVIDED FUNCTIONS OR PROCESSES (OUTSOURCING)

If an organization outsources part of its functions or processes, it is the responsibility of ATC INTERNATIONAL to obtain evidence that the organization has effectively determined the type and extent of controls to be applied in order to ensure that the externally provided functions or processes do not adversely affect the effectiveness of the OHSMS, including the organization's ability to control its OH&S risks and commitments to comply with legal requirements.

ATC INTERNATIONAL will audit and evaluate the effectiveness of the organization's OHSMS in managing any supplied activity and the risk this poses to OHS performance of its own activities and processes and conformity requirements. This may include gathering feedback on the level of effectiveness from suppliers, based:



on the criteria applied by the organization for the evaluation, selection, monitoring of performance and re-evaluation of these external providers based on their ability to provide functions or processes in accordance with specified requirements, in compliance with the legal requirements, and on the risk that the external providers can adversely affect the organization’s ability to control its own OHS risks.

Even if auditing the complete provider’s management system is not required, HOC shall consider those processes or functions included within the scope of the organization’s OHSMS, which have been outsourced to external providers to plan and accomplish an effective audit.

ATC INTERNATIONAL should be able to establish this during the preparation of the certification programme and further verify it during the initial audit, and before every surveillance and recertification audit. it is responsibility of HOC to ensure that audit programme developed based on above requirements.

6. Related Record

N/A