



Abu Dhabi Environment, Health and Safety Management System Regulatory Framework (EHSMS)

Code of Practice

AD EHSMS CoP 08 – Audit and Inspection

Version 1.2

July 2009



الوكالة البيئية - أبوظبي
Environment Agency - ABU DHABI

Table of Contents

1.	Aims and Intent.....	3
1.1	Aims	3
1.2	Intent	3
2.	Application and Implementation	3
2.1	Application.....	3
3.	General Requirements.....	4
3.1	Planning	5
3.2	Responsibilities of EHSMS Auditors	5
3.3	Scope of EHSMS Auditing.....	6
3.4	Managing the Audit Program	7
3.5	Audit Activities	8
3.6	Managing an EHSMS Audit Program.....	9
3.7	Qualifications for EHSMS Auditing Personnel.....	9
3.8	Inspections	10

Code of Practice for Audit and Inspection

1. *Aims and Intent*

1.1 Aims

- (a) The aims of the CoP are to:
- (i) specify the framework in which the process of EHS auditing and inspection shall be conducted and compliance can be assessed against this standard.

1.2 Intent

- (a) The intent of the Code of Practice is:
- (i) to guide the management of EHS audit and inspection by providing a framework for auditing and inspection;
 - (ii) to ensure a systematic approach to EHS audit and inspection; and
 - (iii) to ensure EHS that non-conformances are identified and an appropriate corrective action plan is implemented as early as possible.

2. *Application and Implementation*

2.1 Application

- (a) Health, safety and environment audits may include any or all of the following items:
- (i) compliance with applicable legislation, standards and Codes of Practices;
 - (ii) review of 'lagging' and 'leading' indicator statistics;
 - (iii) review of incidents, non-conformances and corrective actions;
 - (iv) review of performance against health, safety and environment Key Performance Indicators (KPI's); and
 - (v) review of site work practices, behaviors and systems.
- (b) The implementation of health and safety auditing is to establish that:
- (i) appropriate management arrangements are in place;
 - (ii) adequate risk control systems exist, are implemented and are consistent with the hazard profile of the organisation; and
 - (iii) appropriate workplace precautions are in place.
- (c) The audit process involves:
- (i) collecting information about the health and safety management system; and
 - (ii) making judgements about its adequacy and performance.

- (d) An EHS audit shall be a systematic, independent, and documented process for obtaining evidence and evaluating it objectively to determine the extent to which the audit criteria are fulfilled (*ISO 19011:2003*). The process will include planning, document review, on-site audit/inspection, issuing of audit findings, formulation of action plans and follow up of the action plans.
- (e) Qualified professionals with relevant auditing experience can conduct audits and where possible, independent external auditors shall also be used. An audit team shall comprise a Lead Auditor, and a team of experienced, competent persons with the experience in the relevant field (e.g. EMS, OH&S, Risk etc.).
- (f) Each nominated entity is responsible for controlling the regular frequency of audits for its facility or area of management. Line Managers shall be satisfied that appropriate due diligence is being achieved.
- (g) Audit results shall be documented to identify existing deficiencies and required corrective actions. Before being closed out, Corrective Action Requests shall be followed up to ensure that Non-Conformance's have been corrected. Similarly, other management systems, such as the quality system shall also be corrected, if necessary, to prevent recurrence.
- (h) Where the provisions of this CoP are inconsistent with the provisions of any other Emirate Environment, Health and Safety Framework Codes of Practice, the provisions of this CoP shall prevail.

3. General Requirements

- (a) Develop an appropriate Audit Procedure to ensure audits are performed at regular time intervals, including:
 - (i) all nominated entities implementing an Abu Dhabi EHSMS framework will be required to undergo external audits of their EHSMS. The audit shall be performed at least annually as part of the nominated entity's commitment to demonstrating self-regulation;
 - (ii) the annual external audit results shall be submitted to the Sector Regulatory Authority; and
 - (iii) internal and entity self-auditing, performed by qualified in-house personnel or third party auditors. The audit findings shall be recorded and maintained by the employer.
- (b) Develop an appropriate Non-Conformance and Corrective Action Procedure; and
- (c) Develop an appropriate Inspection Procedure.

3.1 Planning

- (a) The personnel responsible for conducting EHSMS audits within Abu Dhabi Emirate shall:
- (i) ensure the audit team has the appropriate range of knowledge and experience to conduct the audit;
 - (ii) establish the audit objectives, criteria, extent, and scope;
 - (iii) define responsibilities of the audit team, allocating adequate resources, and developing suitable procedures;
 - (iv) implement the audit plan or program;
 - (v) maintain records to demonstrate implementation of the audit program; and
 - (vi) monitor the implementation of the audit plan or program and review the audit plan or program at various stages to determine whether the objectives have been met and to identify areas requiring improvement or that can be improved.
- (b) To make the EHSMS audit an effective tool that produces reliable information for a nominated entity to improve on its EHS performance, EHSMS auditors shall uphold the following principles of auditing:
- (i) ethical conduct;
 - (ii) fairness when presenting audit findings;
 - (iii) exercising due care and professionalism when conducting the audit;
 - (iv) freedom from bias and partiality; and
 - (v) utilising the logical, scientific, evidence-based approach for arriving at reliable audit conclusions.

3.2 Responsibilities of EHSMS Auditors

- (a) External EHSMS auditors, and their audit team, have a primary duty of care to the environment and above all to the health and safety of the people in Abu Dhabi Emirate (including their clients). They have ethical as well as technical obligations in the fulfilment of their duties.
- (b) Ethically, External EHSMS Auditors are obliged to:
- (i) provide true and accurate information concerning their investigations;
 - (ii) not issue inaccurate EHSMS audit reports; and
 - (iii) notify the Relevant Authorities of any imminent hazard to workers, the community or the environment, or fraudulent activity, as soon as practicably possible during the course of conducting an EHSMS audit, as required by law.
- (c) Technically, External Auditors are obliged to:

- (i) refer to the most recent guidelines developed by the Relevant Authorities and updated International Standards in the course of conducting an EHS audit;
- (ii) utilise best practice methods while conducting assessments;
- (iii) exercise due care, diligence, and professional judgement while conducting their activities to a standard expected of a qualified EHS Auditor;
- (iv) ensure confidentiality;
- (v) offer services only in areas within their competence and scope of certification; and
- (vi) ensure that EHSMS audit statements or reports are based on sound observations and logical deductions and analysis.

3.3 Scope of EHSMS Auditing

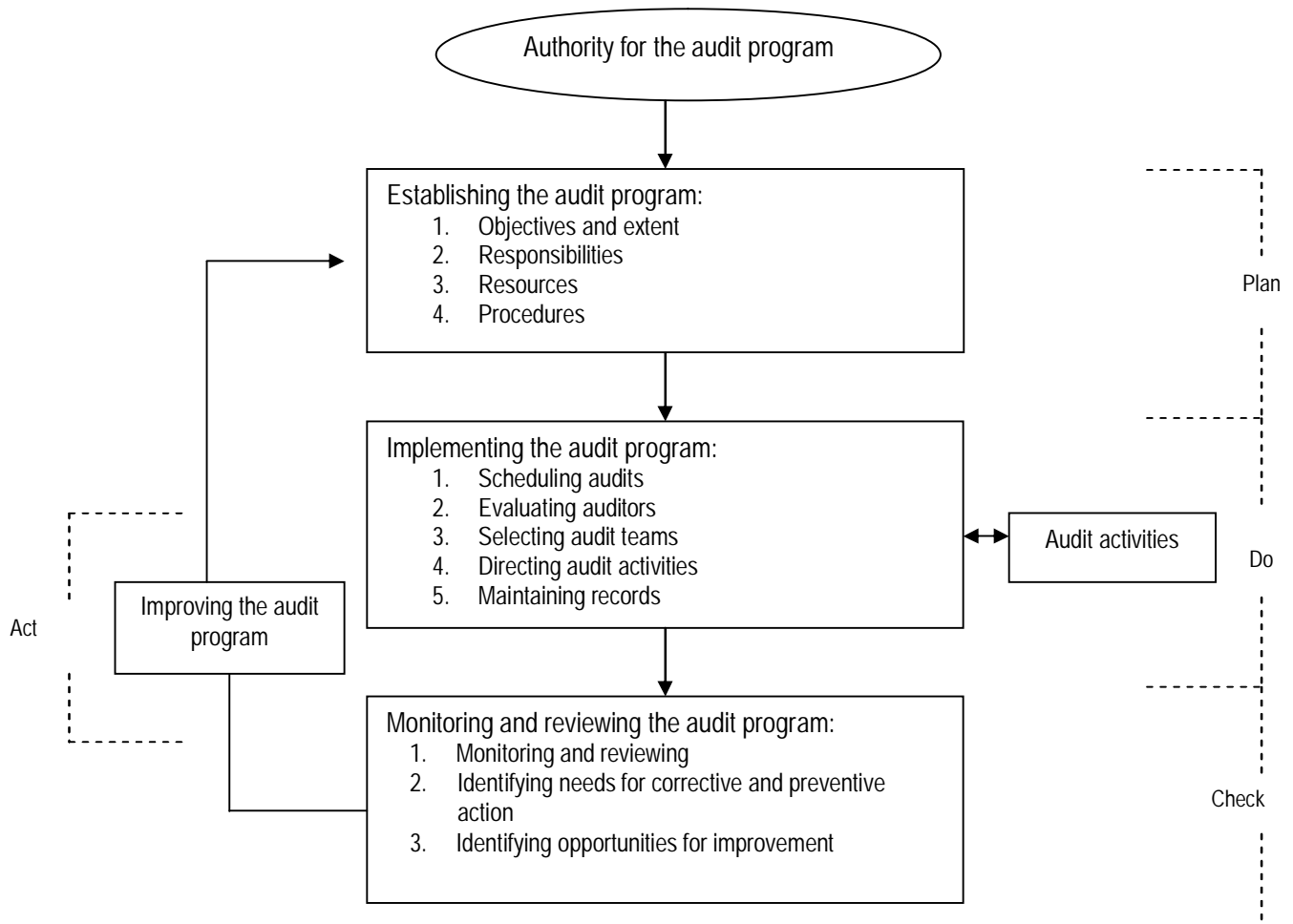
- (a) The scope of EHSMS auditing, for the purposes of implementing the objectives, principles and intent of the EHSMS Framework – the EHSMS minimum requirements as listed in Code of Practice – Self Regulation, shall include (where relevant), but not be limited to the following areas:
 - (i) EHS Management Systems (Manual, Policies, Procedures, CoP's, etc);
 - (ii) defining and communicating EHS roles and responsibilities to all relevant parties;
 - (iii) external reporting requirements;
 - (iv) regular management reviews;
 - (v) discharges to air, water and land;
 - (vi) management of water (wastewater, groundwater, drinking water);
 - (vii) minimisation and management of waste including resource recovery, reuse and recycling;
 - (viii) hazardous waste management and responding accordingly to hazardous releases;
 - (ix) managing hazardous substances such as asbestos, pesticides and oil pollution;
 - (x) noise management;
 - (xi) occupational and public health and safety (includes workers and visitors, customers, neighbours and the community) including personal protective equipment and training and supervision;
 - (xii) adequacy of monitoring and measurement practices (including calibration);
 - (xiii) risk assessment and management including hazard identification and communication;
 - (xiv) hazard identification and reporting activities;

- (xv) incident reporting and investigation activities;
- (xvi) audit and inspection activities;
- (xvii) non-conformance and corrective action activities; and
- (xviii) emergency management planning and response.

3.4 Managing the Audit Program

- (a) An audit program may include one or more audits depending upon the size, nature, and complexity of the entity to be audited.
- (b) An audit program also includes all activities necessary for planning and organising the type and number of audits and for supplying adequate resources to conduct the program effectively and efficiently within the specified timeframe.
- (c) In addition to their internal audit program, nominated entities shall also arrange external audits of their EHSMS. External audits may be useful in providing a more independent assessment of performance and may employ expertise not available in-house.
- (d) Figure 3-1 illustrates the process-flow for the management of an audit program based on the plan-do-check-act methodology described in ISO 19011:2003 (*Guidelines for quality and/or environmental management systems auditing*).

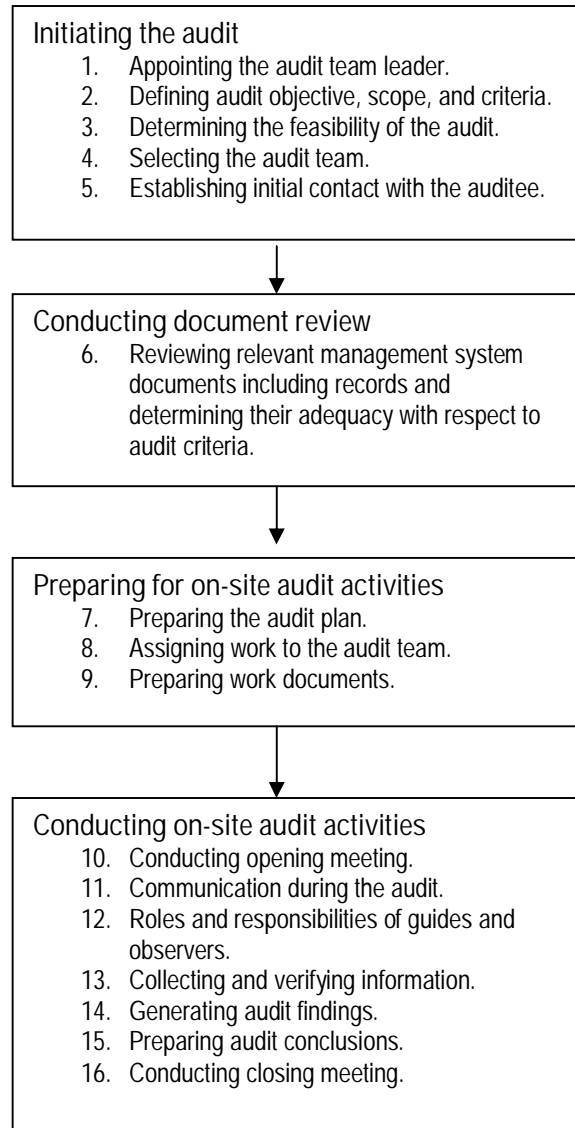
Figure 3-1 Process Flow for the Management of the Audit Program



3.5 Audit Activities

- Figure 3-2 contains guidelines on planning and conducting audit activities as part of the audit program. The extent to which the provisions of these guidelines are applicable depends on the scope and complexity of the specific audit and the intended use of the audit conclusions.
- ISO 19011:2003 (*Guidelines for quality and/or environmental management systems auditing*) provides detailed instructions for implementing audit activities.

Figure 3-2 Planning Audit Activities



3.6 Managing an EHSMS Audit Program

- (a) Authority for conducting random or targeted EHSMS audits shall be granted by senior management. The audit program shall be designed, developed and implemented in accordance with the EHSMS Regulatory Framework.

3.7 Qualifications for EHSMS Auditing Personnel

- (a) Internal EHSMS auditors shall be suitably knowledgeable, experienced and qualified to undertake EHS audits.

- (b) External EHSMS auditors shall be suitably knowledgeable, experienced and qualified to undertake EHSMS audits (as per the Registration of Auditors Mechanism).
- (c) The training undertaken by external EHSMS Auditors shall be recognised and sufficient to be certified to undertake EHSMS audits of management systems in accordance with these standards, or recognised equivalent.
- (d) Only auditors registered with the Competent Authority may conduct external EHSMS audits in accordance with this CoP.

3.8 Inspections

- (a) Inspections refer to a physical walk-through of an area conducted by either the nominated entity or by a Regulatory Agency to determine compliance with regulations and/or sector policies.
- (b) Nominated entities shall develop, implement, and maintain documented procedures for planning and conducting ongoing inspection, testing, and monitoring related to EHS goals and targets set earlier. The frequency of such inspection and testing shall be appropriate to each item inspected, tested or monitored.
- (c) In order for the EHS strategy to be effective, it is essential that inspections be planned and systematic. This does not remove responsibility from nominated entities to be vigilant in recognising and correcting issues that they believe may cause harm or damage.
- (d) At the completion of each inspection, any deficiencies identified shall be noted on a summary sheet for action.
- (e) The supervisor (or equivalent) shall then be de-briefed on ways to address the key issues identified. Any issues that are identified as continuing shall be reported to the area manager and to the person(s) responsible for EHSMS.
- (f) It is the responsibility of each nominated entity to develop, with their work teams, the most efficient manner in which such inspections will be performed. The minimum requirement is that a written procedure for inspections is developed. Figure 3-3 illustrates the process flow for coordinating workplace safety inspections schedules.

Figure 3-3 Coordinating a Workplace Safety Inspection Schedule



© Environment Agency Abu Dhabi 2009

This document is and shall remain the property of the Environment Agency Abu Dhabi. The document may only be used for the purposes for which it was intended. Unauthorised use or reproduction of this document is prohibited.

Document Status

Rev No.	Author	Reviewer		Approved for Issue		
		Name	Signature	Name	Signature	Date
0	A. G. Jukes					