0   SHOWING CONFORMANCE

0.1   Options

0.1.1   There are three options to demonstrate conformance when applying this system procedure:

a.   Follow the defined system procedure using the recommended guidance and tools, including allowed variations and options.

b.   Use an equivalent process and tool set generated elsewhere and document evidence of procedural equivalence.

c.   Use an equivalent bespoke process and tool set for the project and document evidence of procedural equivalence.

1   INTRODUCTION

1.1.1   This procedure is the first in a set of four System Audit procedures and deals with initial audit planning activities. This procedure describes how an audit schedule can be developed in order to organise self audits of the IPT's SMS and EMS. The activities covered in this procedure will form the basis of the system audit process so it is important that issues are considered carefully to avoid duplication of effort or gaps in the audit process later on.

1.1.2   The audit schedule should describe the scope and frequency of self audits and set out a timeframe for their completion.

1.1.3   Although this and the companion procedures have been produced primarily for use by and on behalf of IPTs, they may also be used by ASEG to carry out audits on the SMS and EMS. In addition, these procedures may also be used for auditing all or parts of an IPT's SMS and EMS by other parties such as:

- Functional Safety Board Secretariats;
- DS&C;
- Third Parties invited by CDM;
- Independent Safety Auditors;
- MOD and TLB Internal Audit Functions;
- Equipment system contractor;
- Personnel seconded from another IPT;
- Customer 2;
- SME;
- Environmental and Safety Consultants.

1.1.4   Any third party using these procedures should note that they have primarily been written for use by IPTs and therefore may use terminology specific to IPTs. However,

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this should not preclude a third party from using the procedures.

1.1.5 Throughout the procedures the term 'Audit Client' has been used to describe the group, organisation or individual commissioning an audit, as this may be distinct from the party carrying out the audit.

Figure 1 Steps within the system audit procedures
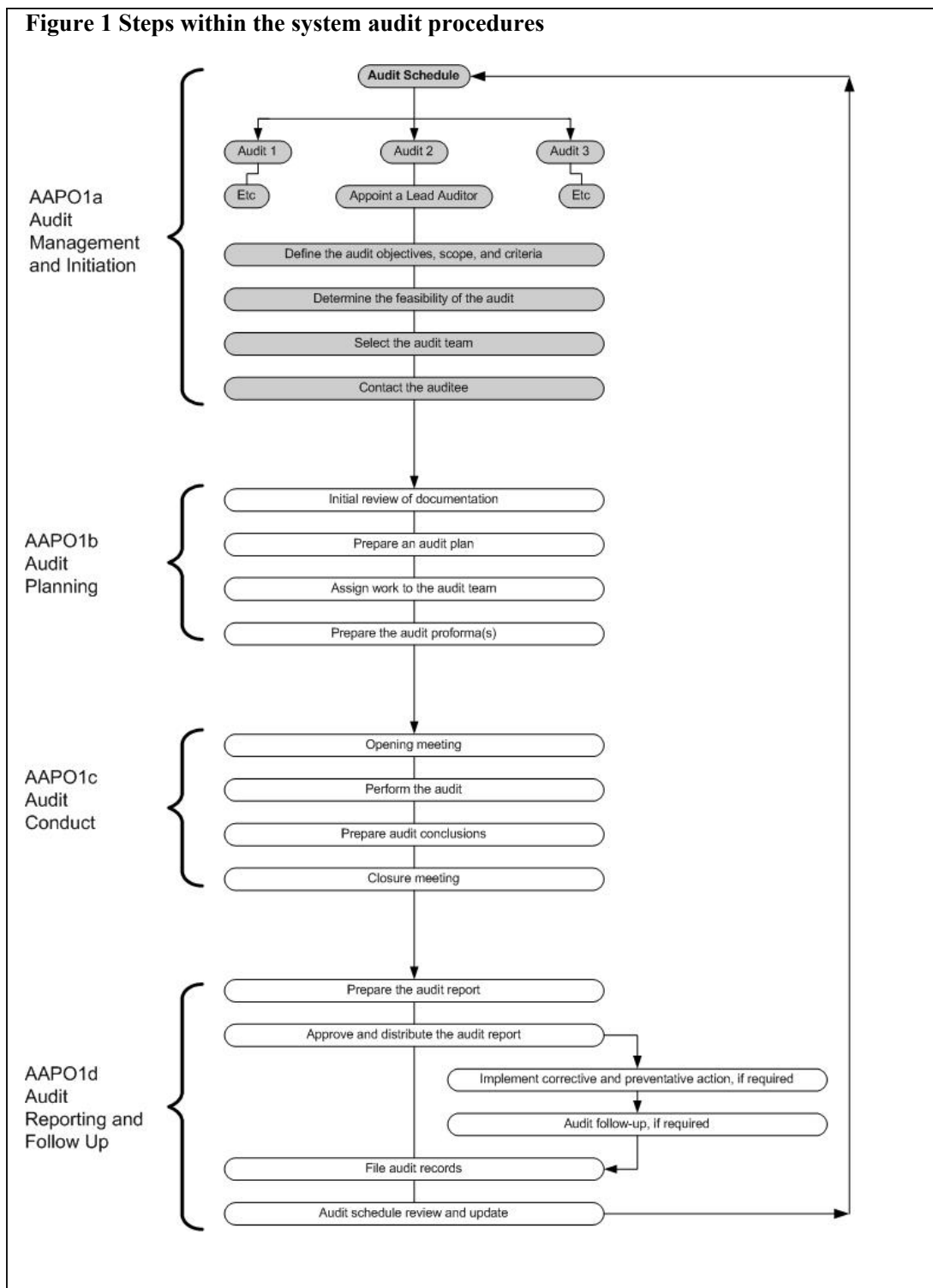
2 PROCEDURE OBJECTIVES

2.1.1 The objectives of this procedure are to:

- Produce a schedule, for auditing all elements of the IPT's SMS and EMS, that includes details on how and when these audits will take place;

- Ensure that audits are undertaken by appropriately competent auditors; and

- Contact the Auditee and confirm arrangements for undertaking the audit.

3 RESPONSIBILITIES

3.1 Accountability

3.1.1 The Audit Client is accountable for the completion of this procedure.

3.2 Procedure Management and Procedure Completion

3.2.1 The diagram below shows the steps described in the Description section of this procedure against those parties or individuals that may be responsible for their completion.
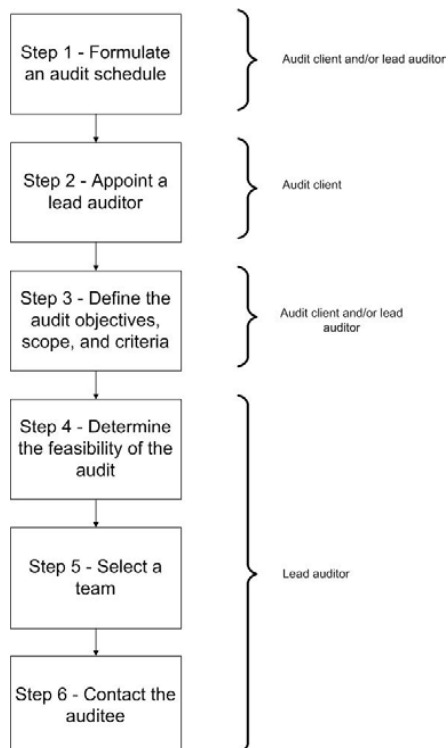
3.2.2 Note that where the Lead Auditor has responsibility, this may on particular occasions be delegated to members of the Audit Team.

4	**WHEN**
4.1.1	This procedure can be applied to the SMS or EMS at any time during its implementation, it is not necessary for the full system to be in place before planning and carrying out audits.
4.1.2	An IPT will be expected to have produced an audit schedule and audited each element of its SMS and EMS before Main Gate. Auditing will continue throughout the life of the project(s).

5	**REQUIRED INPUTS**
5.1.1	Safety and Environmental Case(s), for example:

- Results of previous audits (**Form AAP01d/F/01**);
- Record of Management Reviews (**Form AAP03/F/01**);
- Record of Monitoring and Measurement (**Form AAP02/F/02**);
- Environmental Management Plans (**Form EMP06/F/03**);
- Safety Management Plans (outputs from SMP03)
- Non-Conformance and Corrective Actions (**Form AAP04/F/01**);
- Register of Stakeholder Requirements (**Form EMP01/F/01** and **SMP01/F/02**)
- Register of Standards (**Form EMP01/F/02** and **SMP01/F/03**)
- List of operational controls (**Form EMP07/F/01** and outputs from SMP08)
- Other POSMS and POEMS outputs.

5.1.2	Audit schedules produced by other parties where these cover auditing all or some of the elements of the SMS and EMS.

6	**REQUIRED OUTPUTS**

Form AAP01a/F/01 - Audit Schedule

Form AAP01a/F/02 - Audit Details, Team Composition and Competence Record Form

Form AAP01a/F/03 – Notification of Audit Letter.

OR

Equivalent actions and documentation that ASEG is satisfied achieve the same objectives.

7	**DESCRIPTION**
7.1	**Step 1 – Formulate an audit schedule**
	Introduction

7.1.1 Note: Where the Audit Client wishes to involve the Lead Auditor in the production of the audit schedule then Step 2 – Appoint Lead Auditor should be completed before this step.

7.1.2 In order to produce an audit schedule the following must be decided:

- What elements of the SMS and EMS must the audits cover (i.e. scope);

- How many audits are necessary;

- How often will these audits be undertaken; and

- When audits are to be undertaken.

7.1.3 In terms of scope the schedule can apply to:

- Individual project level SMS and EMSs; or

- Several project level SMS and EMSs; or

- An IPT level SMS and/or EMS.

7.1.4 The organisation and scope of the audit schedule will depend largely on how much of the SMS and EMS is in place and how these systems are organised within the IPT or project. For example, an IPT may decide to develop separate schedules for the SMS and EMS if the systems are distinct from each other, or combine schedules where elements are shared, similar or connected.

7.1.5 The overall audit schedule should cover all the existing elements of the SMS and EMS regardless of whether these are the responsibility of the IPT or a contractor.

7.1.6 When developing the schedule, consideration should be given to any other planned audits that may cover aspects of safety or environmental management. These other audits may fulfil some or all of the objectives of the audit schedule and may therefore be used as alternatives to avoid duplication of effort.

Audit Scope

7.1.7 Although it is possible to audit the whole SMS or EMS at once, this is generally considered poor practice (unless the systems are very simple), as this may require significant Auditee and auditor resources.

7.1.8 It is therefore accepted practice to divide the audit schedule into a number of audits each of which is a manageable task. This can be done in a number of ways:

- By POSMS / POEMS and IPT SMS/EMS requirement - This involves the auditing of the whole project(s) against each POSMS / POEMS and IPT SMS/EMS requirement in turn. This approach may cross several activities and/or projects/organisations.

- By POSMS / POEMS procedure – This approach allows a full audit trail to be gathered.

- By activity, project, organisation or geographical basis – This approach provides a full audit trail only when all departments have been assessed.

- By safety risk or environmental impact - Full audit trails are obtained by crossing projects, organisations or activities, although the audit can be difficult to structure.

7.1.9 When deciding on how to partition the audit schedule, the following issues should be considered:

- Purpose of the audit;

- Any external requests for an audit to take place. For example, from:
  - The delegation chain PM, IPTL, Cluster DG, CDM, SofS (via DESB);
  - Other TLBs;
  - 2* Directors and 1* Deputy Directors;
  - Functional Safety Boards;
  - ASEG;
  - DS&C; and
  - Stakeholders (Customer 1 and 2, DE, CESOs etc) through Safety Committees.

- Scope of the EMS and SMS;

- Relevant domain JSP auditing requirements;

- Stakeholders' expectations;

- Existing IPT audit regimes including any audits planned or recently completed by other parties.

- Logistics;

- Where different parts of the same management system are best audited together;

- Where elements of the safety and environmental management systems are best audited together;

- The auditees and auditors likely to be involved;

- Timeframe for implementing the management system(s); and

- The frequency that the system element needs to be audited (i.e. try not to group elements of the management system which are best audited at a different frequency).

7.1.10 SMS and EMS elements would be expected to be audited more frequently in the following situations:

- They have not been covered or only partially covered by previous audits;

- A high number of non-conformances have been identified;

- There is a high safety risk or priority environmental impact;

- Accidents, incidents or occurrences with safety or environmental implications have been reported;

- A prescriptive legal or other standard applies;

- There is a demonstrable level of stakeholder interest or concern;

7.1.11 There may also be a need for more frequent audits in cases where:

- The project is approaching a critical milestone;

- There has been a major change in procedures, equipment system specification or use, or environmental and safety standards;

- There have been major staff changes.

7.1.12 When you have partitioned up the audit schedule into manageable pieces, double check that all elements to be audited are being covered.

Audit Frequency

7.1.13 The next task in formulating the audit schedule is to set a frequency for how often each audit should be completed. Audit frequency should be kept to a minimum to reduce the likelihood of 'audit fatigue' in the Auditee, but frequent enough to provide assurance that the management system(s) is operating effectively.

7.1.14 The frequency of audits will vary from project to project but should aim to cover each element of the management system(s) at least once every 3 years. To avoid 'over-auditing' it is recommended that each element of the management system should be audited no more frequently than every 6 months (this excludes follow-up checks).

7.1.15 The IPT should refer to the relevant domain JSP to establish whether it requires a shorter minimum auditing interval (higher frequency). Audit frequency may also be influenced by stakeholders' expectations, existing IPT's regimes and Project Review and Assurance (PR&A) schedules.

Documentation and Communication

7.1.16 Form AAP01a/F/01 - Audit Schedule can be used to record the scope, frequency and timing of audit(s).

7.1.17 For audits where the audit client is not the IPTL, it is recommended that the Auditee should be contacted at this early stage to give them advance notice of the impending audit. **Form AAP01a/F/03** may be used for this purpose.

7.2 Step 2 – Appoint the Lead Auditor

7.2.1 For each audit defined in the audit schedule, a Lead Auditor should be appointed. The Lead Auditor may be selected from any of the following groups:

- The Audit Client;

- The equipment system contractor, (eg where they have a significant role in implementing the SMS and/or EMS)*;

- From another IPT than is to be audited**;

- SMEs (eg Safety and/or Environmental Consultants)**;

- Another part of the MOD.

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*   Where an IPT uses equipment system contractors to audit the SMS or EMS, then the IPT is to undertake sample checks on the audit schedule to ensure the procedure has been followed correctly.

**   The use of these parties may be helpful in cases where it is important to demonstrate the independence of the auditors from the IPT.

7.2.2 The following aspects should be considered when appointing the Lead Auditor:

- Auditing competency;
- Knowledge of POSMS and POEMS;
- Equipment system and domain knowledge;
- Personal attributes; and
- Security clearance.

7.2.3 Further information on establishing and evaluating auditor competency can be found in guidance sheet **AAP01a/G/01 –** Auditor Competency Interim Guidance**.**

7.3 Step 3 – Define the audit objectives, scope and criteria

7.3.1 Although the audit schedule defines the general scope of the audit, more detail on its scope, objectives and criteria should be defined by the Audit Client and Lead Auditor (see Section 8 of POSMS and POEMS).

7.3.2 Audit criteria should be used to determine the tests for conformity with the objectives of the audit and be defined through discussions between the Audit Client and the Lead Auditor. **Form AAP01a/F/02 -** Audit Details, Team Composition and Competence Record Form can be used to record these decisions.

7.3.3 As part of the audit, the Audit Client may also request that the Lead Auditor:

- Provides recommendations to address any non-conformance identified;
- Reviews corrective and preventive actions proposed by Auditee; and
- Completes follow-up checks to confirm non-conformances have been closed out.

7.4 Step 4 – Check the feasibility of the audit

7.4.1 The Auditee should be given sufficient notice that an audit will be taking place and be made aware of the objectives, scope and criteria of the audit. This will not only remind the Auditee of the planned audit, but also allow the feasibility of undertaking the audit as timetabled to be confirmed. **Form AAP01a/F/03 –** Notification of Audit Letter may be used for this purpose.

7.4.2 Factors that will affect the feasibility of undertaking the audit at a particular time will include the availability of:

- Sufficient and appropriate information to plan the audit; and
- Adequate time and resources of the Auditee and auditors.

7.4.3 If it has been determined that it is not feasible to undertake the audit, an alternative solution should be agreed between the Audit Client, Lead Auditor and Auditee.

7.5   Step 5 – Select the audit team

7.5.1   Depending on the scope, size, and timescale of the audit, an Audit Team may consist of only the Lead Auditor, or it may consist of a number of auditors. When selecting members of the Audit Team, the following issues should also be considered:

- Audit objectives, scope and criteria (See **Form AAP01a/F/02**);
- Independence of the Audit Team and the entity being audited;
- Audit timescales (See **Form AAP01a/F/02**);
- Auditor availability; and
- Competence of Audit Team to achieve audit objectives.

7.5.2   It is reasonable to include Aspirant Auditors within the Audit Team as a means to improve their competence level for future audits, as long as the aspirant auditor is not permitted to audit without appropriate direction and guidance from a competent auditor(s). On particularly large or complex audits it may be advisable to have administrative support within the Audit Team. Note it is also possible to meet skills or knowledge requirements through the inclusion of an auditing expert or Subject Matter Expert to support the Audit Team.

7.5.3   Further information on establishing and evaluating auditor competency can be found in guidance sheet **AAP01a/G/01 -** Auditor Competency Interim Guidance.

7.6   Step 6 – Contacting the Auditee

7.6.1   The Lead Auditor should contact the Auditee to arrange an initial visit prior to the onsite audit phase. This should take place no less than 1 month before the site audit to allow the Auditee sufficient time to prepare for the audit.

7.6.2   The objectives of this initial visit include:

- For the Auditee to understand the purpose of the audit;
- To enable audit methodology, limitations and timetable to be discussed;
- For the Auditee to meet the Lead Auditor (or team member) and for them to explain who has been appointed on the Audit Team;
- To establish Auditee role/contribution to the audit (e.g. to provide a guide to escort the team during the audit and provide access to areas, documentation and staff)
- To identify staff to be interviewed and their availability;
- To agree office and support arrangements for the Audit Team;
- For the Lead Auditor to gain an understanding of the area(s) to be audited;
- To identify documentation which will be required to be examined before and during the audit;
- To confirm confidentiality of documentation; and
- To facilitate the production of the audit plan.

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7.6.3 Where the Lead Auditor considers that an initial site visit is not appropriate or required, then planning for the audit can be made by letter/e-mail etc. Issues to consider in deciding whether a site visit is required are as follows:

- Existing familiarity with the area being audited;

- Travel time/costs; and

- Type, scope and depth of audit.

7.6.4 The Lead Auditor may also utilise a Pre-Audit Questionnaire where they consider that this would be of benefit to the audit process. The time the Auditee will need to complete the questionnaire should be minimal and the questionnaire should only be used to gather information to assist in the audit planning and document review stage, not as a replacement of work which should be completed during the on-site audit.

7.6.5 Where the Auditee objects to any members of the Audit Team completing the audit, then they should have a strong justified reason for doing so before another team member is appointed. Where the Audit Client and Auditee are unable to agree on a particular Audit Team member (including the Lead Auditor) then this should be referred to ASEG.

8   RECORDS AND PROJECT DOCUMENTATION

8.1.1 Where relevant, the outputs from this procedure should feed into the following:

- Assurance and Audit Procedure AAP01b – Audit Planning

8.1.2 A copy of the information produced by following this procedure should be stored in the Project Safety and Environmental Cases as appropriate.

9   RECOMMENDED TOOLS AND FORMS

a. **Form AAP01a/F/01** - Audit Schedule

b. **Form AAP01a/F/02** - Audit Details, Team Composition and Competence Record Form

c. **AAP01a/G/01** – Auditor Competency Interim Guidance

d. **Form AAP01a/F/03** – Notification of Audit Form

10   GUIDANCE

10.1   General

10.1.1 JSP 375, 430, 454, 518, 520, 538, 553 and the SHEF audit manual all include information on auditing. The ISO14000 series is useful, particularly ISO14001 and ISO14004, and also OHSAS 18001, ISO 19011 and ISO9001.

10.1.2 Although auditing Customer 2 is out of the scope of the audit procedure, information provided by Customer 2 in showing compliance with SMS and EMS requirements, and required equipment system safety and environmental performance (e.g. objectives and targets and operational controls) should be included in the audit.

10.1.3   If an IPT already has a project management system or procedures (eg ISO 9000) that cover system auditing, then these may be used in place of these POSMS and POEMS procedures so long as ASEG is satisfied that they meet the same objectives.

10.1.4   Further guidance on the application of this procedure can be obtained from ASEG. The Institute of Environmental Management and Assessment (IEMA) and Institute of Safety and Health (IOSH) are professional bodies in environmental and safety auditing respectively and may hold useful information on auditing (Further information can be found at http://www.iema.net & http://www.iosh.co.uk).

10.2   Aligning Safety and Environment

10.2.1   The key alignment opportunity in this procedure is to ensure that both safety and environmental issues are audited together, where this is practical and beneficial.

10.3   Guidance for ASEG

10.3.1   In addition to completing sample audits of IPT's safety and environmental managements systems, ASEG should ensure that it also audits its compliance against the procedures which solely apply to ASEG, eg SSP01b, SSP02b, SSP03b.

10.4   Warnings and Potential Project Risks

10.4.1   If audits are not completed correctly or not completed at all, there is an increased risk that IPTs fail to operate effective SMS and EMS, which in turn increases the risk of poor or ineffective management of safety and/or environmental risks within the project(s). It may also lead to delays and cost impacts if shortcomings in the SMS and/or EMS are identified late, because rework may be required or approvals may be delayed.

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Form AAP01a/F/01 – Audit Schedule						
Project(s) Title						
IPT:						
Completed by:			**Date:**			
Reviewed by:			**Date:**			
Audit title or ref	**Audit scope**	**Audit date**	**Audit Frequency**	**Date completed**	**Auditee's details**	**Additional information**

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Form AAP01a/F/02 – Audit Details, Team Composition and Competence Record		
Project(s) Title		
IPT:		
Completed by:	**Date:**	
Reviewed by:	**Date:**	
Audit title or ref:		
Lead Auditor (name and organisation):		
Audit team (names & organisations):		
Competency details of each member of team (See Form AAP01a/G/01)		
Audit scope:		
Audit objectives:		
Audit criteria:		
Auditee:		
Planned date for audit:		
Security classification:	**Unrestricted / Restricted / Secret / Top-Secret**	
Additional information:		

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AAP01a/G/01 – Audit Competency Interim Guidance	
There are 3 main parties involved in auditing the safety and environmental management systems in POEMS and POSMS, these being: • **Lead Auditor** – The person responsible for leading and managing an audit and audit team. • **Auditor** – A person who forms part of an audit team • **Aspirant Auditor** – A person who forms part of the audit team who is undergoing training, or other development process, in order to attain auditor status.	
General attributes of all auditors:	
Personal:	Auditors at all levels should be - • Ethical. • Open-minded. • Diplomatic. • Observant. • Perceptive. • Versatile. • Decisive. • Self-reliant.
Knowledge and skills:	**All staff involved in auditing POSMS and POEMS procedures should be able to:** • Apply audit principles, procedures and techniques. • Conduct an audit (or designated task) within agreed time schedule. • Collect information through effective interviewing, listening, observing and reviewing relevant information. • Verify the accuracy of collected information. • Use correct documentation to record audit activities. • Prepare audit reports. • Maintain confidentiality. • Understand system standards. • Have an awareness of relevant laws, regulations and requirements. • Understand relevant environmental and safety terminology. • Understand environmental/safety management principles. • Understand relevant environmental and safety management tools.

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Aspirant auditor	
Competency and experience:	Initially the most important areas of experience and competence are the attributes outlined in the General Attributes section above. However, in addition aspirant auditors should: • Have some knowledge of, and the ability to apply (under supervision) audit processes. • Be proficient at effectively utilising their time during audits. • Provide assistance to the Lead Auditor and audit team members where required. • Help with the preparation and production of the audit report. • Understand MoD Safety and Environmental management requirements. • Have knowledge of ASEMS, POEMS and POSMS.
Auditor	
Competency and experience:	An Auditor is expected to: • Have successfully completed an accredited auditing course (eg ISO 14001, 9001, OHSAS 18001) or have equivalent practical training and experience. • Have gained experience in the entire audit process by participating in a minimum of two audits, including undertaking document review and audit reporting. • Be proficient at effectively utilising their time during audits. • Provide assistance to aspirant auditors. • Help with the preparation and production of the audit report. • Understand MoD safety and environmental management requirements. • Have knowledge of ASEMS, POEMS and POSMS.
Lead Auditor:	
Competency and experience:	A Lead Auditor is expected to: • Have successfully completed an accredited auditing course (eg ISO 14001, 9001, OHSAS 18001) or have equivalent practical training and experience. • Have acted as an auditor in at least two complete audits. • Advise on and interpret requirements of audit processes with sufficient breadth of experience, knowledge and depth of understanding, to be able to apply audit management requirements. • Generate an effective auditing strategy and plan, based on the identified audit requirements. • Be proficient at planning and effectively utilising resources during audits. • Organise and direct audit team members. • Provide guidance and assistance to aspirant auditors.

- Lead the audit team to reach the audit conclusions.

- Prepare, complete and review the audit report.

- Understand MoD safety and environmental management requirements.

- Have knowledge of ASEMS, POEMS and POSMS and domain functional policy requirements. Do not forget that any audit must be able to inform the functional Boards that policy is being implemented effectively.

Note that whilst Lead Auditors are required to have competencies in auditing and ASEMS, it is not necessary for them to be competent with the domain of the equipment and services being audited. The Lead Auditor can call on auditors with domain competence, or SMEs to support, or be part of, the audit team.

AAP01a/F/03 – Notification of Audit Letter

Example letter to notify Auditee of an impending audit

To: *(Auditee)*

RE: PROJECT ORIENTED ENVIRONMENTAL AND SAFETY MANAGEMENT SYSTEM (POEMS/POSMS) AUDIT

As part of the continual improvement in the operation of (*insert IPT/project(s)*) safety and environmental management systems, I have been requested by (*insert Audit Client name*) to act as Lead Auditor for a system audit covering (*insert detail of scope of audit)to* be undertaken on (*Date).*

The objectives of the audit will be *(Insert objectives of audit).*

Please can you and/or your Safety Manager/Project Manager attend a pre-audit meeting with me and my colleague(s) (*insert name of Audit Team Member(s)*) so we can discuss the audit process and scope and prepare for undertaking the audit.

Please do not hesitate to contact me (*insert contact details*) if you have any queries. Otherwise I will contact you in one week to confirm a mutually acceptable date and time for the pre-audit meeting.

From: *(Insert name Lead Auditor)*