



*The Certificate of Recognition Program
Standards & Guidelines –
Addendum to Standard 3.12 (Rev. 4)*

Employer Audit Quality Assurance (EAQA) Process
(Effective date: January 1, 2016)

PURPOSE

This addendum describes the Employer Audit Quality Assurance (EAQA) process, including the definition of the roles and responsibilities of WorkSafeBC, the Certifying Partners (CPs), and the employers.

STANDARDS & GUIDELINES

Standards & Guidelines 3.12: WorkSafeBC will provide quality assurance in relation to auditor training and employer audits.

The integrity of the COR program is dependent upon a high level of assurance that reported audit results are credible and verifiable.

In relation to employer audits, WorkSafeBC provides quality assurance by ... requesting verification audits, as appropriate..... WorkSafeBC may require the certifying partner to conduct an external audit of the employer's health and safety management system in order to confirm whether COR certification is appropriate.

Standards & Guidelines Appendix F: Auditor and Audit Process Quality Assurance

Complaint and issue management:

WorkSafeBC process to manage officer complaints, repeat &/or frequent orders, fatal and serious injuries, penalties and other issues related to OH&S and the COR program ... complaints from public, employers and auditors about the program or certified employers – result in review of employer program and auditor activities progressing to verification audit and de-certification – done in partnership with CP.

INTERPRETATION GUIDELINES

The EAQA Process

In cases where the EAQA process presented in this document is not adequate to guide the CP on what specific action to take in specific circumstances, the CP must discuss the issue with WorkSafeBC to obtain instructions on how to proceed with the case *before* finalizing arrangements with any employers involved.

The EAQA process has five phases:

- a) Initiation
- b) Analysis
- c) Implementation
- d) Result reporting
- e) Conclusion

1 Phase 1: Initiation

The purpose of the initiation phase is to identify a shortlist of COR-certified employers who will be analyzed to determine whether the validity of their COR-certification needs to be confirmed through further quality assurance activities.

- 1.1 All employers with COR certification are subject to the quality assurance (QA) process.
- 1.2 WorkSafeBC identifies COR-certified employers with at least one of the following indicators, as identified in Appendix F of the S&G:
 - Officer complaints
 - Repeat orders
 - Frequent orders
 - Fatal injuries
 - Serious injuries
 - Penalties
 - Complaints from the public, employers, or auditors about the program or certified employers
 - Other issues related to OH&S and the COR program
- 1.3 Indicators classified under "Other issues related to OH&S and the COR program" may include the following:
 - High-risk violation orders
 - Occupational Health & Safety Regulation (OHSR) program orders
 - Worsening injury rate trend or significant injury rate increase
 - Warning letter from WorkSafeBC
 - Proceeding prosecution
 - Significant incident
 - Significant close calls
 - Worsening experience rating
 - Young worker injuries
- 1.4 COR-certified employers with at least one of the indicators above make up the shortlist proceeding to the analysis phase.

2 Phase 2: Analysis

WorkSafeBC analyzes each shortlisted employer to determine whether the validity of their COR certification needs to be reviewed by considering numerous circumstances, such as:

- Past EAQA history
- Nature of OHS order(s) issued
- Quantity of OHS order(s) issued
- WorkSafeBC Officer comments
- Young/new worker injury

- Number of WorkSafeBC officer visits
- Trends/history of OHS orders
- Repeat violations
- Information derived from warning letters
- COR certification date
- Timing of the indicator(s) related to the latest OHS COR-qualified audit

2.1 After considering the circumstances listed above, WorkSafeBC places each shortlisted employer into one of three categories:

- 1) No further action needed
- 2) Review of occupational health and safety management system (OHSMS) recommended
- 3) WorkSafeBC-initiated verification audit (WIVA) required

When determining which category each employer belongs to, WorkSafeBC focuses on the overall performance of the employer’s OHSMS and not the specific indicator(s) and/or circumstance(s).

These categories are described in more detail below.

2.2 **“No further action needed” category**

An employer in this category has an indicator(s) and/or a circumstance(s) that upon review does not appear to indicate a failure of the employer’s OHSMS.

2.3 **“Review of OHSMS recommended” category**

An employer in this category has an indicator(s) and/or a circumstance(s) that upon review may indicate a failure of the employer’s OHSMS.

2.4 **“WIVA required” category**

An employer in this category has an indicator(s) and/or a circumstance(s) that, upon review, indicates a potential failure of the employer’s OHSMS. WorkSafeBC requires an external audit of the employer’s OHSMS to confirm whether continued COR certification is appropriate.

The WIVA will determine if the employer possesses the minimum OHSMS standards required for COR certification. Identifying employers who do not meet the program’s minimum requirements and removing their certification is required to maintain the program’s integrity.

By joining the COR program the employer previously voluntarily agreed to abide by the S&G, which includes the possibility of being subjected to a WIVA. Not agreeing to participate fully in the WIVA will result in a lapse in the employer’s COR certification.

2.5 WorkSafeBC provides the CP with the preliminary list of employers in the “WIVA required” category. The information may include the specific OHSMS element(s) and/or site(s) that are associated with the indicator(s) and/or circumstance(s).

2.6 The CP reviews the “WIVA required” preliminary list. If the CP possesses information about an employer that supports continued COR certification, the CP will discuss each case with

WorkSafeBC. WorkSafeBC may only remove an employer from the preliminary list if they acquire new information which WorkSafeBC feels confirms the validity of the COR certification thereby reducing the need for a verification audit to be conducted.

- 2.7 For each "WIVA required" employer, the CP provides to WorkSafeBC:
- a) Contact information for the primary person responsible for health and safety
 - b) Confirmation if any of the employers' current certifications involved a "joint audit"
- 2.8 WorkSafeBC finalizes the employers on the "WIVA required" list and provides the list to each CP.
- 2.9 WorkSafeBC finalizes the employers on the "Review of OHSMS recommended" list and provides the list to each CP.

The intention of providing CPs with the "Review of OHSMS recommended list" is to give CPs an opportunity to work with those employers on improving their OHSMS and/or worksite(s), focusing on the element(s) indicating potential weakness(es) in the employer's OHSMS.

3 Phase 3: Implementation

In this phase, WorkSafeBC requires the CPs to conduct a WIVA on the employers in the "WIVA required" category.

The CP must complete the WIVA process within the QA year, including the submission of required forms and supporting documentation, if any, to WorkSafeBC.

- 3.1 WorkSafeBC sends a letter, copying the CP, to inform the employer they have been selected for a WIVA. The letter explains that not fully participating in the WIVA will result in a lapse of COR certification. Also, the letter describes:
- a) What may happen if the employer does not pass the WIVA
 - b) The need for timely completion of an action plan or re-certification by an external auditor, depending on the initial WIVA result
 - c) That employers with lapsed COR certification are not considered for a financial incentive
- 3.2 The CP must inform WorkSafeBC, in writing, by January 31 of the QA year if a "WIVA required" employer's COR certification lapsed in the year previous to the QA year. These employers will be re-categorized as "**WIVA suspended.**" WIVA suspended employers do not proceed with Phase 3 Implementation, or to Phase 4 Result Reporting in the QA year. WorkSafeBC will send a letter to the employer describing the conditions under which they may apply for COR re-certification. Please refer to Phase 5 Conclusion which describes these conditions.
- 3.3 The CP contacts the "WIVA required" employer and explains:
- a) The WIVA must be conducted in their next scheduled COR audit as a re-certification audit for that QA year

- b) An external auditor, selected by the CP, will be conducting the WIVA
- c) The CP will bear the cost of hiring the external auditor

3.4 For WIVA purposes, the CP selects for each employer an external auditor who:

- a) Has not conducted an audit for that employer in the current certificate lifecycle
- b) Is not an employee or dependent contractor of the CP where the employer is registered and COR certified

Standard 4.5 of the COR S&G requires internal auditors to conduct a minimum of two audits within the three-year period between their initial approval certification and their re-approval, or between their subsequent re-approvals. For this purpose, the CP may allow the certified internal auditor of the employer for WIVA to join the audit at a participation level of comparable scope as deemed appropriate by the CP. In such cases where the internal auditor participates in the WIVA, the external auditor will be the lead auditor, on record, for the WIVA.

3.5 The CP proceeds with the WIVA using their own COR re-certification audit procedures.

Accounts that are COR-certified through a “joint audit” will undergo the WIVA jointly, and the WIVA results and consequences will be applied jointly.

For accounts with a return-to-work (RTW) COR, both the OHSMS and RTW system will be audited at the same time. The CP will bear the cost of hiring the external auditor in doing the OHS and RTW audit.

For employers with multiple classification units (CUs), the WIVA will only cover CUs that are COR-certified. For example:

	Scenario	Result
Case 1	Employer A has CU 1 (COR) and CU 2 (non-COR), and CU 1 triggered	WIVA will only cover CU 1 of Employer A
Case 2	Employer B has CU 3 (COR), CU 4 (COR), and CU 5 (non-COR), and CU 5 triggered	No WIVA for any CUs of Employer B
Case 3	Employer C has CU 6 (COR) and CU 7 (COR), and CU 6 triggered	WIVA will cover both CU 6 and CU 7 of Employer C

3.6 The CP uses their own COR certification audit tool, appropriate to the employer’s current size, to conduct the WIVA. This means that the CP can no longer use any of the following other audit tools previously allowed for WIVA, including but not limited to:

- a) The WorkSafeBC WIVA case study tool
- b) The CP verification tool
- c) WorkSafeBC-approved blended WIVA tool

3.7 The external auditor conducts the WIVA audit and submits the audit results to the CP.

4 Phase 4: Result Reporting

The purpose of the result-reporting phase is for the CP to submit the WIVA results to WorkSafeBC.

4.1 The CP communicates to WorkSafeBC the WIVA results of an employer by submitting the WorkSafeBC-prescribed "WIVA Result" form and "WIVA Result Follow-up" form, if required. Upon request by WorkSafeBC, the CP must also provide a copy of the WIVA audit report.

Note: The CP does **not** use the usual process of entering audit information into the iCOR database for WIVA employers in the QA year.

4.2 The initial WIVA results will be one of the following:

- a) **Non-compliance** – The employer did not participate in the WIVA fully.
- b) **Pass** – The total audit score is 80 percent or more, and the score on each individual element is 50 percent or more.
- c) **Minor nonconformity** – The total score 70 percent or more but less than 80 percent, and the score on each individual element is 50 percent or more.
- d) **Major nonconformity** – The total score is less than 70 percent, and/or the score on any individual elements is less than 50 percent.

Note:

- "Non-compliance" is defined differently dependent upon the level of participation the employer displayed, if any, in the WIVA process. For clarification, refer to the subsequent "Non-compliance" references.

4.3 For a "**Non-compliance**" initial WIVA result:

- a. When there is no WIVA audit for the CP to report by December 31 of the QA year, the CP communicates to WorkSafeBC the initial WIVA result of "**Non-compliance**" by submitting the WorkSafeBC-prescribed initial "WIVA Result" form. While the CP may be informed of the employer's intention to not participate in the WIVA much earlier, the CP should not submit the WIVA result form until the end of the QA year unless the WorkSafeBC account becomes inactive.
- b. The submission of the "WIVA Result Follow-up" form is not required.
- c. The employer now proceeds to the conclusion phase.

4.4 For a "**Pass**" initial WIVA result:

- a) Within 45 days from the last day of the WIVA, the CP must first deliver the official audit report to the employer and then communicate to WorkSafeBC the initial WIVA results by submitting the WorkSafeBC-prescribed initial "WIVA Result" form.
- b) The submission of the "WIVA Result Follow-up" form is not required.
- c) The employer now proceeds to the conclusion phase.

Note:

- The CP must complete the WIVA process within the QA year, including the submission of required forms and supporting documentation, if any, to WorkSafeBC.

4.5 For a **“Minor nonconformity”** initial WIVA result:

- Within 45 days from the last day of the WIVA, the CP must first deliver the official audit report to the employer and then communicate to WorkSafeBC the initial WIVA results by submitting the WorkSafeBC-prescribed initial “WIVA Result” form.
- Within 45 days of receiving the official audit report from the CP, the employer must submit an action plan, in writing, to the CP to address any audit-identified deficiencies in their OHSMS.
 - If the employer does not submit an action plan, in writing, to the CP within the required time, the employer receives a **“Non-compliance”** result. The CP promptly communicates to WorkSafeBC the final WIVA result of **“Non-compliance”** by submitting the WorkSafeBC-prescribed “WIVA Result Follow-up” form.
- Upon receipt of the employer’s action plan within the required time, the CP performs a detailed review of the action plan documentation and supporting evidence, if any, to determine if the action plan is appropriate and sufficient to correct the audit-identified deficiencies.
 - If the employer’s action plan was submitted within the required time, and is deemed appropriate and sufficient by the CP, they receive a **“Pass.”** The implementation of the action plan must be verified by the COR auditor in the next COR audit and must undergo a detailed paper review by the CP to ensure that the audit-identified deficiencies are remedied as required in Standard 1.11 of the COR S&G.
 - If the employer’s action plan was submitted within the required time, and is deemed not appropriate or sufficient by the CP, they receive a **“Fail”**.
- The CP communicates to WorkSafeBC the final WIVA result of either **“Pass”** or **“Fail”** by submitting the WorkSafeBC-prescribed “WIVA Result Follow-up” form within 45 days from receiving the action plan from the employer.
- The employer now proceeds to the conclusion phase.

Notes:

- The CP must complete the WIVA process within the QA year, including the submission of required forms and supporting documentation, if any, to WorkSafeBC.
- The practice of limited audit scope auditing is not permitted in the WIVA process.

4.6 For a **“Major nonconformity”** initial WIVA result:

- Within 45 days from the last day of the WIVA, the CP must first deliver the official audit report to the employer and then communicate to WorkSafeBC the initial WIVA results by submitting the WorkSafeBC-prescribed initial “WIVA Result” form.
- Within 45 days of receiving the official audit report from the CP, the employer must complete another full re-certification follow-up audit by the same external auditor. The employer is responsible for the costs associated with this full re-certification follow-up audit.
 - If the last day of onsite audit activity of the full re-certification follow-up audit does not occur within 45 days of the employer receiving the official audit report from the CP, the

employer receives a **“Non-compliance”** result. The CP promptly communicates to WorkSafeBC the final WIVA result of **“Non-compliance”** by submitting the WorkSafeBC-prescribed “WIVA Result Follow-up” form.

- c) Upon receipt of the full re-certification follow-up audit conducted within the required time, the CP performs audit quality assurance activities.
 - i. A full recertification follow up audit with a passing audit score receives a **“Pass.”** A passing audit score is a total audit score 80 percent or more, and the score on each individual element is 50 percent or more.
 - ii. A full recertification follow up audit with a failing audit score receives a **“Fail”**. A **“Fail”** is a total audit score less than 80 percent, and/or the score on any individual element is less than 50 percent.
- d) The CP communicates to WorkSafeBC the final WIVA result of either **“Pass”** or **“Fail”** by submitting the WorkSafeBC-prescribed “WIVA Result Follow-up” form within 45 days from the last day of the full re-certification follow-up audit.
- e) The employer now proceeds to the conclusion phase.

Notes:

- The CP must complete the WIVA process within the QA year, including the submission of required forms and supporting documentation, if any, to WorkSafeBC.
- The practice of limited audit scope auditing is not permitted in the WIVA process.

5 Phase 5: Conclusion

The purpose of the conclusion phase is to confirm whether or not continued COR certification for the “WIVA required” employers is appropriate.

5.1 For employers with a **“Pass”** final WIVA result:

- a) WorkSafeBC informs the employers, in writing, copying the CP, that they have passed the WIVA and their COR certification remains valid.
- b) WorkSafeBC records the audit result in iCOR, both as a verification audit record and a re-certification audit record.
- c) A new certificate is created and delivered to the CP, who will forward it to the employer.

5.2 For employers with a **“Fail”** final WIVA result:

- a) WorkSafeBC informs the employers, in writing, copying the CP, that their final WIVA result is a **“Fail”** and their COR certification is considered to have lapsed in the QA year (including their RTW COR if they currently have it, since achievement of the RTW COR requires concurrent achievement of OHS COR).
- b) The letter reconfirms that since a valid certification is required for incentive consideration, they will not be considered for an incentive for the QA year.
- c) Additionally, it outlines the conditions to be met if they wish to re-enter the COR program.

5.3 For employers with a **“Non-compliance”** final WIVA result:

- a) WorkSafeBC informs the employers, in writing, copying the CP, that their COR certification is considered to have lapsed in the QA year.
- b) The letter reconfirms that, since a valid certification is required for incentive consideration, they will not be considered for an incentive for the QA year (including their RTW COR if they currently have it, since achievement of the RTW COR requires concurrent achievement of OHS COR).
- c) Additionally, it outlines the conditions to be met if they wish to re-enter the COR program.

5.4 If an employer wishes to re-enter the COR program after its COR certification lapsed due to a **“Fail”** or a **“Non-compliance”** final WIVA result:

- a) The employer applies to a CP for COR re-certification.
- b) The employer is not permitted to re-certify during the same QA year.
- c) The employer is not eligible for an incentive payment related to the QA year in question.
- d) The employer, regardless of size, can only be re-certified by undergoing a full re-certification audit conducted by an external auditor.
- e) The employer is responsible for choosing the external auditor and for all costs associated with this full re-certification audit.
- f) The external auditor chosen cannot have conducted an audit for that employer in the previous certificate lifecycle, and cannot be an employee or dependent contractor of the CP where the employer is registered to become COR certified.

5.5 If an employer wishes to re-enter the COR program after previously been determined to be **“WIVA suspended”**:

The employer must satisfy all the requirements outlined in 5.4, excluding items 5.4b and 5.4c.

- 6 In cases where the EAQA process presented in this document is not adequate to guide the CP on what specific action to take on specific circumstances, the CP must discuss the issue with WorkSafeBC to obtain instructions on how to proceed with the case *before* finalizing arrangements with any employers involved.
- 7 WorkSafeBC conducts an annual review of the WIVA results to assess opportunities for improvement and the need for changes to the COR program.

EFFECTIVE DATE: January 1, 2016