

COR[®] **INTERNAL** **AUDITOR** **PROGRAM**

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Program Goals

As a COR® Certifying Partner, BCCSA is obliged to ensure Auditors maintain a high standard of ethical behavior and professional performance in their auditing role. BCCSA has an obligation to WorkSafeBC and to the construction industry to qualify Auditors that will consistently conduct themselves with honesty, integrity and the highest degree of professionalism as outlined in the BCCSA Internal Auditor Code of Conduct. The BCCSA's COR® Internal Auditor Program is focused on accountability to this standard.



Roles & Responsibilities

British Columbia Construction Safety Alliance (BCCSA)

The BCCSA is responsible for overseeing and maintaining the integrity of the COR® Program and the work of COR® Auditors. This includes, but is not limited to, Auditor:

- Qualification
- Training
- Quality assurance
- Mentorship
- Disciplinary Action

The COR® Internal Auditor Program is intended to promote an ethical and cooperative culture in the COR® program amongst all Auditors. The BCCSA will review and evaluate the work of COR® Auditors to ensure that they are communicating accurate information to companies, performing pre-audit planning that results in clear communication of audit expectations, conducting COR® audits using the established protocol and required audit tool(s), and submitting COR® audit reports that meet the identified standards. This will be done through training, communication, mentoring, and disciplinary action as required.

Internal Auditor

COR® Internal Auditors are responsible for conducting themselves with integrity, establishing and maintaining trust with the BCCSA and those in which they audit. This provides the basis for reliance on their judgment. Integrity requires Auditors to meet the established auditing standards and also requires Auditors to observe the principles of independence, objectivity, standards of professional conduct, and absolute honesty in their work. The responsibilities of the Auditor during the audit process places a high ethical demand on their conduct and professional practices. Auditors must exhibit the highest level of professional objectivity in gathering, evaluating and communicating information about the audit activities. They must make a balanced assessment of all the relevant circumstances and are not to be unduly influenced by their own interests or by others when forming judgments.

WorkSafeBC

WorkSafeBC's document, *The Certificate of Recognition Program: Standards & Guidelines* sets out the standards and guidelines associated with British Columbia's COR® program and Part 4 of the document outlines responsibilities and requirements associated with COR® Auditors. BCCSA expects Auditors to review Part 4 of this document and become familiar with the content. The following are key excerpts from *The Certificate of Recognition Program: Standards & Guidelines* outlining Internal Auditor qualification standards, training requirements, and ethical practices:

Definition:

Internal Auditor – This individual is a permanent employee of the employer who has received a minimum of 14 hours of combined instruction and training from a Certifying Partner on how to conduct, document, and score a COR® audit of health and safety management systems and/or injury management/return-to-work systems. If the employer is a small employer (with fewer than 20 workers), the internal auditor is empowered to conduct both certification audits and annual maintenance audits. If the employer is a large employer (with 20 or more workers), the internal auditor is empowered to conduct annual maintenance audits only. Note that in order to perform an internal audit on a large employer, the auditor must be trained to utilize the large employer audit tool, which may exceed the minimum 14 hours of required training.

- 4.2** COR® auditors must observe professional practices, demonstrate competence in occupational health and safety, and possess an appropriate mix of skills and attributes.
- 4.3** COR® auditors must have completed COR®-specific training required for the type of audit they will be performing.
- 4.4** COR® auditors must commit to the “Code of Conduct for COR® Auditors.” The “Code of Conduct for COR® Auditors” calls for auditors to:

- exercise honesty, objectivity, and diligence in the performance of their duties
- not knowingly engage in acts or activities that are discreditable to the profession of auditing in the occupational health and safety field
- only undertake work activity that they are competent and qualified to carry out
- protect the confidentiality of information obtained during the audit and ensure the anonymity of all individuals contacted during the audit process
- apply a continuous improvement methodology in all services rendered
- maintain the highest standards of honesty and integrity during the application of audits

- 4.5** COR® auditors must maintain the quality and currency of their skill set and knowledge base.

Approved COR® program auditors are required to keep current on auditing quality standards and audit instrument use, and they are expected to pursue opportunities to improve and maintain their auditing skills. To this end, COR® auditors must:

- be re-approved at least once every 3 years
- complete a minimum of 7 hours of auditor refresher/recertification training or equivalent as deemed appropriate by the certifying partner over the three-year auditor certification period to be eligible for re-approval

*Internal Auditors must also conduct a minimum of 2 audits within the 3 year period between their initial certification and their certification expiration date. The Certifying Partner may accept team audits from certified auditors to satisfy this requirement, provided the auditors are involved in document reviews, interviews, and observation processes.

Internal Auditor Code of Conduct

Overview

The **BC Construction Safety Alliance (BCCSA) Code of Conduct** describes the principles and rules of conduct that govern the behavior of BCCSA qualified Internal Auditors. These standards provide principles and rules for Auditor conduct that are the standards expected for all auditors. Internal Auditors are to conduct themselves in a manner consistent with the promotion of cooperative, professional and ethical relations between the construction sector and the BCCSA.

The Code of Conduct is based on 2 components:

1. Principles relevant to the profession and the practice of auditing.
2. Rules of Conduct that describe expected behavior of auditors. The rules are intended as an aid to interpreting the Principles into practical application and are intended to guide the ethical conduct of Auditors.

Expectations

The following are the principles and rules that all BCCSA Internal Auditors are to follow. The fact that a particular conduct is not mentioned in this Code does not prevent an action from being unacceptable, and therefore, an Auditor or institution can be liable for disciplinary action. Auditors shall not violate the Code of Conduct. Any breach of the Code will result in a formal review and disciplinary action.

A. Integrity

The integrity of Auditors establishes trust and provides the basis for reliance on their judgment. Integrity requires Auditors to observe both the form and spirit of auditing standards. It also requires Auditors to observe the principles of independence, objectivity, standards of professional conduct, and absolute honesty in their work. Auditors shall:

- Follow high standards of honesty, fairness, integrity and ethical conduct.
- Respect and act with dedication to the COR® Program goals and vision.
- Conduct audits in an honest and fair manner, without actual or apparent conflict of interest.
- Advise the BCCSA in writing with reasons, whenever the activities or conduct of an auditor appear to be in conflict with this Code.
- Not be associated with any report, statement or representation known to be false or misleading.
- Respect the integrity of other Auditors, recognizing their different experiences and areas of expertise.
- Comply with the *Workers Compensation Act and the Occupational Health and Safety Regulations*, as well as all other applicable laws and regulations.
- Serve the company being audited, in a conscientious, diligent, respectful, and efficient manner.

B. Objectivity

Auditors must exhibit the highest level of professional objectivity in gathering, evaluating, and communicating information about the audit activities. They must make a balanced assessment of all the relevant circumstances and are not to be unduly influenced by their own interests or by others when forming judgments. It is essential that Auditors are independent and impartial, not only in fact but also in appearance. Auditors shall:

- Separate facts from opinions and base evaluations on objective and measurable data, not subjective opinions, unfounded assumptions, or personal bias.
- Conduct the audit as instructed by the audit protocol without bias, prejudice, variance or compromise.
- Remain free of any influence, interest or relationship that impairs professional judgment, independence or objectivity while auditing.

C. Confidentiality

Auditors must respect the value and ownership of information they receive during an audit and not disclose information to any third party, orally or in writing, without appropriate authority, and unless there is a legal or professional obligation to do so. Auditors shall:

- Maintain the confidentiality of information received during the audit.
- Be prudent in the use of information acquired in the course of their work.
- Take all reasonable steps to protect the confidentiality of the audit results, data collected and the anonymity of interviewees.
- Not use audit information for any personal gain, financial or otherwise that would be contrary to the law, the audit process, or detrimental to the BCCSA.
- Not share, either for profit or otherwise, any BCCSA process or program materials without written permission from the BCCSA.

D. Competency

Auditors must apply the knowledge, skills and experience needed in the performance of auditing services. Auditors shall:

- Continually seek to maintain and improve their proficiency, effectiveness, and quality of their skills.
- Be consistent and accurate in their evaluations of data obtained through documentation, interviews and observations.
- Ensure that the comments, notes, and recommendations are clear, concise, and written in plain language.
- Strive to be complete in their evaluations and avoid any omissions.
- Not plagiarize in part or whole the work of other auditors, or any person and does not boilerplate audit reports
- Provide support for Auditor opinions through quantitative, measurable data.
- Assist companies with any post audit questions, such as recommendations or explanations of results.
- Make relevant and meaningful recommendations that add value to improving the health and safety management systems of the company being audited.
- Be timely in the performance of the audit and comply with the required timelines for audit completion, submission, and correction, as communicated to the Auditor by the BCCSA and the company.

Rule of Conduct

As per WorkSafeBC's The Certificate of Recognition Standards and Guidelines item 4.5: COR® Auditors must maintain the quality and currency of their skill set and knowledge base. Approved COR® program Auditors are required to keep current on auditing quality standards and audit instrument use, and they are expected to pursue opportunities to improve and maintain their auditing skills. To this end, COR® Auditors must:

- Be re-approved at least once every 3 years.
- Complete at least a minimum of 7 hours of auditor refresher/recertification training or equivalent as deemed appropriate by the certifying partner over the 3 year auditor certification period to be eligible for re-approval.

E. Compliance

COR® Auditors must comply with BCCSA COR® program policies and procedures, conducting COR® audits in accordance with established audit protocol and participating cooperatively with the BCCSA in the administration of the COR® program. Auditors shall:

- Submit Notices and Audit Reports within the specified timelines.
- Complete audits that address the COR® program minimum scope requirements.
- Comply with audit report submission requirements.
- Perform the necessary minimum number of audits to maintain certification.
- Keep updated on the COR® program via the BCCSA website and Auditor correspondence.
- Participate in BCCSA quality assurance activities and comply with quality assurance outcomes.
- Follow the Auditor Code of Conduct.

Auditor Qualifications & Training

Step 1

Review the *Terms of Participation*, competency requirements and pre-requisites needed to become a COR® Internal Auditor.

Step 2

Complete the 2 day COR® Internal Auditor course.

Step 3

Complete a successful student audit assignment on a host construction company within 4 weeks of your last day of training. Student audit assignments will be evaluated against a detailed quantitative marking scale. Student audit assignment instructions as well as the mark sheet will be reviewed with each student auditor during the COR® Internal Auditor Training course. Successful student Auditors will be issued a COR® Internal Auditor certificate valid for 3 years.

Note:

Certification is maintained through submission of 2 COR® audits by the qualified COR® Internal Auditors within the 3 year period.

Performance Management

Outline

BC Construction Safety Alliance's performance management of COR® Auditors will include the following elements:

- Communication / Training & Mentorship
- Quality Assurance of Audit Reports
- Quality Assurance of Internal Auditors
- Disciplinary Action

Communication/Training & Mentorship

BCCSA will communicate all updates and changes related to the COR® program and the performance of COR® Auditors in writing via email. COR® Internal Auditors have a responsibility to keep current with all BCCSA notices and activities through reading all correspondence issued.

Mentorship is a key element in the improvement of auditing skills and BCCSA will work to provide COR® Auditors with information, feedback, and coaching, when necessary.

The onus to remain informed lies with the COR® Auditor and the BCCSA expects that Auditors read and respond to communications including emails, newsletters, directives, and all other correspondence regarding their performance, and updates to COR®.

Quality Assurance of Audit Reports

All audit reports submitted to the BCCSA will be subjected to a formal desktop review. Audits which do not meet the required standard are sent back to the Internal Auditor for revision and re-submission. Auditors will receive a notification containing appropriate instructions on aspects of the audit report which require improvements.

The BC Construction Safety Alliance deems any unsubstantiated, non-verifiable, and/or false reports as breaches of the BCCSA Internal Auditor Code of Conduct and is grounds for BCCSA to trigger disciplinary action on an Auditor.

As a COR® Certifying Partner, the BCCSA, in accordance with the WorkSafeBC's *The Certificate of Recognition Program: Standards and Guidelines* is required to perform periodic quality assurance audits on Auditors to ensure their work is of an acceptable standard. This type of audit utilizes established practices to evaluate an Auditor's performance and auditing skills.

These audits are performed at no cost to the company and are conducted by the BCCSA (or an assigned representative).

Disciplinary Action

Auditor performance concerns and issues may come to BCCSA's attention through a number of avenues such as:

- Results from quality assurance on audit reports
- Results from quality assurance audits on Internal Auditors
- Complaints or reports from companies participating in the COR® program
- Complaints or reports from other Certifying Partners
- Requests and inquiries from WorkSafeBC

The BCCSA will investigate all performance concerns and issues to confirm validity and apply disciplinary action as outlined within the Disciplinary Action Policy. The BCCSA is not required to apply progressive discipline in situations which are serious in nature and warrant severe penalties up to and including permanent removal of certification.

Disciplinary Action Policy

- 2.1** All BCCSA Internal Auditors will be provided access to this Disciplinary Action Policy as part of the Internal Auditor qualification process.
- 2.2** As a condition of maintaining their BCCSA auditor certification, all auditors shall agree to be bound by the disciplinary process outlined in this policy by signing the BCCSA Internal Auditor Terms of Participation.
- 2.3** Reported and/or confirmed auditor performance issues, whether relating to ethical or quality assurance issues, will remain on an Auditor's file.
- 2.4** Any organization that is affected by an Auditor performance management issue, whether relating to ethical or quality assurance issues, may be notified by BCCSA, as set out in the Agreement.
- 2.5** When BCCSA receives notice from another Certifying Partner that it found a BCCSA Internal Auditor to have committed one or more serious infractions as determined by the BCCSA, or the equivalent, BCCSA may initiate an investigation of the Auditor. As part of its investigation, BCCSA may discipline the Auditor in accordance with this Policy, but is not obligated to do so.
- 2.6** Once BCCSA begins an investigation into an Auditor's performance, and particularly when discipline that could affect the Auditor's certification may result, BCCSA will notify the Auditor verbally, if possible, and in writing, that while BCCSA's investigation is ongoing, the Auditor is subject to suspension while BCCSA completes its investigation ("Interim Suspension").
 - 2.6.1** Auditors subject to an Interim Suspension are prohibited from conducting any new audits with BCCSA.
 - 2.6.2** Upon being notified of an Interim Suspension, BCCSA will communicate what, if any, audits the auditor may complete during an Interim Suspension.
 - 2.6.3** Any audits completed and submitted after an Interim Suspension is imposed and for which written approval was not obtained may not be accepted by BCCSA.
- 2.7** Disciplinary measures are effective immediately upon notice to the Auditor by BCCSA.
- 2.8** BCCSA's written notice to the Auditor setting out the disciplinary decision will be accompanied by instructions on the appeals process. While BCCSA is handling an appeal the Auditor is subject to suspension while BCCSA completes its investigation.
- 2.9** The enforcement of disciplinary decisions made under this policy is not delayed or suspended during the appeal period, if an auditor submits a request for appeal, or while an appeal is heard or waiting to be heard.
- 2.10** All other applicable Certificate of Recognition Certifying Partners and WorkSafeBC will be notified if the Auditor is suspended for 12 months or more as a result of discipline in accordance with this policy.
- 2.11** Table 1- Auditor Disciplinary Action Table itemizes violations and consequences based on confirmed Auditor behaviors. The BCCSA is not limited in applying disciplinary action consequences to the items listed within Table 1 and the [Terms of Participation](#).

TABLE 1 Auditor Disciplinary Action Table

VIOLATION	1st OCCURENCE CONSEQUENCE	2nd OCCURENCE CONSEQUENCE	3rd OCCURENCE CONSEQUENCE
Incomplete and/or insufficient audit data within audit report.	Verbal warning	Written letter on file	Written letter on file and consequences as deemed necessary by the BCCSA. This may include and is not limited to: <ul style="list-style-type: none"> • Suspension • Requirement to take training • Termination
Use of obsolete COR® forms and documents.	Verbal warning	Written letter on file	Written letter on file and consequences as deemed necessary by the BCCSA. This may include and is not limited to: <ul style="list-style-type: none"> • Suspension • Requirement to take training • Termination
Completing audits that do not meet the minimum audit scope requirements with regards to interviews and worksite observations.	Written letter on file	Written letter on file and suspension	Written letter on file and consequences as deemed necessary by the BCCSA. This may include and is not limited to: <ul style="list-style-type: none"> • Suspension • Requirement to take training • Termination
Replicating audit reports from previous audit reports for the same company or across different companies.	Written letter on file and consequences as deemed necessary by the BCCSA. This may include and is not limited to: <ul style="list-style-type: none"> • Suspension • Requirement to take training • Termination 	Written letter on file and consequences as deemed necessary by the BCCSA. This may include and is not limited to: <ul style="list-style-type: none"> • Suspension • Requirement to take training • Termination 	Written letter on file and consequences as deemed necessary by the BCCSA. This may include: <ul style="list-style-type: none"> • Suspension • Requirement to take training • Termination
Manipulation of audit data (documentation review, site observation & interview results) to alter audit scores. (BCCSA will perform investigation prior to consequences being enacted.)	Written letter on file and consequences as deemed necessary by the BCCSA. This may include and is not limited to: <ul style="list-style-type: none"> • Suspension • Requirement to take training • Termination 	Written letter on file and consequences as deemed necessary by the BCCSA. This may include and is not limited to: <ul style="list-style-type: none"> • Suspension • Requirement to take training • Termination 	Written letter on file and consequences as deemed necessary by the BCCSA. This may include and is not limited to: <ul style="list-style-type: none"> • Suspension • Requirement to take training • Termination

VIOLATION	1 st OCCURENCE CONSEQUENCE	2 nd OCCURENCE CONSEQUENCE	3 rd OCCURENCE CONSEQUENCE
<p>Unprofessional conduct</p> <p>(Lack of PPE, use of profanity, defamatory language against BCCSA or companies being audited, discriminatory practices etc.)</p>	<p>Written letter on file</p>	<p>Written letter on file and suspension</p>	<p>Written letter on file and consequences as deemed necessary by the BCCSA. This may include and is not limited to:</p> <ul style="list-style-type: none"> • Suspension • Requirement to take training • Termination
<p>Confidential information audit information revealed.</p>	<p>Written letter on file and consequences as deemed necessary by the BCCSA. This may include and is not limited to:</p> <ul style="list-style-type: none"> • Suspension • Requirement to take training • Termination 	<p>Written letter on file and consequences as deemed necessary by the BCCSA. This may include and is not limited to:</p> <ul style="list-style-type: none"> • Suspension • Requirement to take training • Termination 	<p>Written letter on file and consequences as deemed necessary by the BCCSA. This may include and is not limited to:</p> <ul style="list-style-type: none"> • Suspension • Requirement to take training • Termination
<p>Conduct an audit outside of the Auditor's scope of knowledge</p>	<p>Written letter on file</p>	<p>Written letter on file and suspension</p>	<p>Written letter on file and consequences as deemed necessary by the BCCSA. This may include:</p> <ul style="list-style-type: none"> • Suspension • Requirement to take training • Termination