



# GROUP AUDIT OF RELATED EMPLOYERS

Effective Date: October 13, 2021

Owned by: Manager,  
Safety Audits & Certifications

Approval: \_\_\_\_\_

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## SUMMARY OF CHANGES

This Summary shows:

- All changes from last approved and published document
- The location within the document where the changes have been made

Version	Date	Author(s)	Revision Notes
1.0	December 05, 2018	Melissa Mass	This is the first revision of the Group Audit of Related Employers Procedure. This revision brings the Procedure template into alignment with the templates used by the Governing Documents Framework.
1.1	October 13, 2021	Juliet Goodwin	3 Year review

 Requirements changed in the new revision will be identified with a revision triangle beside it.

## SUMMARY OF REVIEWERS

The following people were involved in the review of this Procedure.

Name	Position
Juliet Goodwin	Manager, Safety Audits and Certifications

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## 1.0 ABOUT THIS PROCEDURE

### 1.1 Purpose and Direction

This procedure describes the process by which two or more related employers, each separately incorporated and with their own WCB account, may conduct one representative audit of the group for the purposes of obtaining or maintaining a COR in the following circumstances:<sup>1</sup>

- the employers are related through common ownership and controlled together
- the employers all use a common health and safety system
- the audit is representative of the overall operations of the entire group of employers

### 1.2 Scope

There are cases where individually incorporated companies, each with their own WCB accounts, function as a singular entity in terms of ownership and control. Where these employers also share a single health and safety management system, they may be eligible to participate in a single, shared audit. It is important to note that while there may be efficiencies gained in a shared group audit, there is also a risk. A serious incident with any one of the employers could impact the COR status of all the related employers that were included in the original audit scope.

If a group of related employers meet the criteria laid out in this procedure, they may choose to be treated as the equivalent of a single employer with respect to their audit and audit requirements. For example, interview and work site sampling requirements would be based on the total combined operation.

The initial audit for a group of related employers must always be a certification audit. Each individual employer in the group receives their own COR. In subsequent maintenance years, group members can pursue group or individual maintenance audits or options to maintain their individual COR certification. However, group members can never be added without a fresh external audit for certification.

### 1.3 Target Audience

The target audience for this document is all Energy Safety Canada personnel in any work location. This includes Employers, Auditors and applicable governing bodies.

## 2.0 PROCEDURE

2.1 In order to be eligible for a group audit of related employers, all related employers in the group must demonstrate they are:

2.1.1 Incorporated legal entities.

2.1.2 Related through a common ownership, either on the basis of a common shareholder or through a subsidiary company structure.

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- For publicly traded companies, the application would have to demonstrate at least one shareholder who has a significant ownership position in all of the group member companies.
- 2.1.3 Controlled together, through shared directors, senior management, or centralized reporting relationships.
  - 2.1.4 Sharing a common health and safety management system that is actively used for all operations.
- 2.2 Related employers must apply to Energy Safety Canada for approval for a group audit by completing the Application to Conduct a Group Audit of Related Employers, at the time of audit registration.
    - 2.2.1 The application must be submitted annually.
    - 2.2.2 The application must be completed in full, including a sign-off by the company president, director or senior manager.
    - 2.2.3 Audit registration will only proceed once the application has been granted approval.
  - 2.3 For companies that are publicly traded, the application must identify, at a minimum, at least one shareholder who has a significant ownership position in all of the group member companies. This is to establish that the companies are jointly owned and controlled together. The intent is to demonstrate common ownership; the full roster of minority shareholders is not required.
  - 2.4 For approval to conduct a group audit of related employers, the following criteria must be met:
    - 2.4.1 Each of the employers must be an incorporated legal entity.
    - 2.4.2 The employers must be commonly owned as evidenced by the existence of at least one shareholder in common, and/or through a hierarchical ownership structure of subsidiary companies.
    - 2.4.3 The employers must be controlled together as evidenced by the existence of common directors, shared senior management personnel, and/or centralized reporting relationships.
    - 2.4.4 The employers must share a common health and safety management system, and all operations must actively use this system.
  - 2.5 Energy Safety Canada shall inform all related employers in writing of its decision to approve or deny the application for a group audit.

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- 2.5.1 Both the related employers' application and Energy Safety Canada's formal response shall be kept on file for a minimum of three years for future reference.
- 2.6 The auditor must conduct the group audit of related employers as if they were a single combined entity. As such, the auditor:
- 2.6.1 Must ensure that work site and interview sampling is representative of the overall operations of the whole group.
- The total number of required work sites visited, and interviews conducted must be based on the total number of work sites and employees for the group as a whole
- 2.6.2 Must provide additional information on the individual employers when submitting their audit for QA review. This includes:
- The total number of employees for each employer (as well as a breakdown of the corresponding number of managers, supervisors, and workers)
  - The total number of employees interviewed for each employer (as well as a breakdown of the corresponding number of managers, supervisors, and workers)
  - A further breakdown of sampling information for any individual employer that has multiple work sites or different business operations or processes
- 2.7 Where a group audit of related employers for certification is successful (i.e., 80%+ overall, 50%+ for each audit element), each of the related employers are issued a separate COR in their own legal name with a common audit date and expiry date.
- 2.8 Maintenance requirements for related employers that have undergone a group audit for certification are as follows:
- 2.8.1 All original group members may choose to conduct a single group audit for maintenance purposes or conduct a single maintenance option that applies to the group as a whole.
- 2.8.2 Some or all group members may conduct individual maintenance audits or maintenance options.
- In this case, all original group members must successfully fulfill their maintenance requirements either individually or as part of a group audit.
- 2.8.3 Energy Safety Canada will then confirm the status of the related employers during maintenance years based on their application.
- Any changes in ownership, control, or relation to the group shall be documented
  - Where applicable, these changes shall be registered with the appropriate governing body

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- 2.9 In the event that a group of related employers wishes to include additional employers in the group, they must undergo a new group audit for certification purposes.
- 2.10 In the event that an employer review must be conducted for any of related employers, Energy Safety Canada and/or the applicable governing body shall determine whether the review will include one, some, or all of the related employers.

### 3.0 ROLES & RESPONSIBILITIES FOR PROCEDURE

<p>Related Employers</p>	<p><i>Initially:</i></p> <ul style="list-style-type: none"> <li>○ Each year submit their application and required documentation for a group audit of related employers to Energy Safety Canada for approval in conjunction with their audit registration application</li> </ul> <p><i>If the related employers are fulfilling maintenance requirements through (an) audit(s) or (an) option(s):</i></p> <ul style="list-style-type: none"> <li>○ May opt for any one of the following three possibilities: <ul style="list-style-type: none"> <li>○ Conduct a group maintenance audit or engage in maintenance options as a singular group</li> <li>○ Conduct individual maintenance audits or options for each legal entity</li> <li>○ A combination of the above where some related employers fulfill maintenance requirements as a group and some opt for individual maintenance audits or options</li> </ul> </li> <li>○ Provide Energy Safety Canada with any information and requisite documentation regarding any changes in ownership, control, or relation to the group.</li> </ul>
<p>Energy Safety Canada</p>	<p><i>Initially:</i></p> <ul style="list-style-type: none"> <li>○ Reviews and approves or denies the application for a group audit of related employers. As part of the approval process, Energy Safety Canada will establish that the related employers: <ul style="list-style-type: none"> <li>○ Are incorporated legal entities</li> <li>○ Are related through common ownership</li> <li>○ Are controlled together</li> <li>○ Share a common health and safety management system that is actively used for all operations</li> <li>○ Archives both the related employer’s application and Energy Safety Canada’s formal response for a minimum of three years</li> </ul> </li> </ul> <p><i>If a group audit of related employers for certification purposes is approved:</i></p> <ul style="list-style-type: none"> <li>○ Register both the related employers as a group and the individual employers with the relevant governing bodies to allow</li> </ul>

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	<p>each to receive their own COR certificate in their own legal name (with a shared audit and expiry date)</p> <ul style="list-style-type: none"> <li>○ Provide individual COR certificates to each of the individual employers in their own legal name in those cases where Energy Safety Canada issues certificates apart from governing bodies</li> </ul> <p><i>If the related employers are fulfilling maintenance requirements through (an) audit(s) or (an) option(s):</i></p> <ul style="list-style-type: none"> <li>○ Ensure all original related employers have fulfilled their maintenance requirements via a group or individual maintenance audit(s) or approved maintenance option(s)</li> <li>○ Forward any changes in any individual group member’s ownership, control, or relation to the group to governing bodies as required</li> <li>○ In the event an OSAR or verification audit is required for an employer certified as part of a group audit of related employers, the actual scope of this review will be negotiated with the appropriate governing bodies as required</li> </ul>
<p style="text-align: center;">Auditor</p>	<p><i>After approval for a group audit of related employers is granted:</i></p> <ul style="list-style-type: none"> <li>○ Registers and submits the Application to Conduct a Group Audit of Related Employers</li> <li>○ Conducts the group audit as if the related employers were a single combined entity. This includes adhering to all required sampling requirements             <ul style="list-style-type: none"> <li>○ Work site and interview sampling is based on the total number of work sites and employees for all operations combined</li> <li>○ The sampling must be representative of the operations of the whole group</li> </ul> </li> <li>○ Provides additional information unique to group audits of related employers, including:             <ul style="list-style-type: none"> <li>○ The total number of employees for each employer with a corresponding breakdown by manager, supervisor, and worker</li> <li>○ The total number of employees interviewed for each employer (as well as corresponding breakdown by manager, supervisor, and worker)</li> <li>○ A further breakdown of sampling information for any one of the employers that has multiple work sites or different business operations or processes</li> </ul> </li> </ul>

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