



# MAINTENANCE AUDIT PROCEDURE

Effective Date: November 8, 2021

Owned by: Manager  
Safety Audits & Certifications

Approval: *Juliet Hoodwire*

Approved By: Manager,  
Safety Audits & Certifications

Valid Until: November 8, 2024

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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 11, 2018	Melissa Mass	This is the first revision of the Maintenance Audit Procedure. This revision brings the Procedure template into alignment with the templates used by the Governing Documents Framework.
1.1	June 10, 2020	Melissa Mass	Removed Safety Survey from Section 3.0 as a maintenance option and reformatted entire document.
1.2	November 8, 2021	Julie Remington	3 Year review- Removed responsibilities within the report as there was already a table within the policy.

 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
Julie Remington	Quality Assurance, Safety Audits and Certifications

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## 1.0 ABOUT THIS PROCEDURE

### 1.1 Purpose and Direction

An employer must complete an annual Certificate of Recognition (COR) maintenance audit to:

- maintain the status of their COR
- remain eligible for any associated provincial government financial incentives<sup>1</sup>

### 1.2 Scope

Continuous health and safety program evaluations are an essential part of the COR program. The maintenance audit procedure was developed as a guideline to provide information to maintain a company's COR during the two non-certification years.

### 1.3 Target Audience

The target audience for this document is all Energy Safety Canada personnel in any work location. This includes:

- All Energy Safety Canada employees, contract workers, consultants and agents
- All certified Energy Safety Canada Auditors and approved corporate auditors involved in Certificate of Recognition audits

Throughout this document, the terms “Energy Safety Canada” and “Energy Safety Canada personnel” are used to refer to the target audience.

## 2.0 PROCEDURE

### 2.1 Timing of Maintenance Audits

- 2.1.1 Audits must be conducted during times of the year when work activities are at their highest.
- 2.1.2 Maintenance audits should have data gathering activities completed by the employer's anniversary date on their COR certificate or by the end of the quarter the anniversary date falls in (Q1, Q2, Q3 or Q4).
- 2.1.3 If the anniversary date falls in the last month of the year, data gathering activities must be completed prior to the end of the calendar year.
- 2.1.4 If data gathering activities go beyond the calendar year, the audit would be deemed invalid and the employers COR cancelled.
  - If this occurs, a new certification audit would need to be conducted to recertify the employer's COR. This audit would need to be conducted by an Energy Safety Canada external auditor.

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- 2.1.5 Data gathering activities must be completed within 45 days of the audit start date and before December 31 of the maintenance year.
- In extenuating circumstances, where the auditor requires more time to complete on-site data gathering activities, prior approval may be requested of Energy Safety Canada and the governing body. This approval is not guaranteed. Such extensions may only be applied for the 45-day collection window and not go beyond December 31.
- 2.1.6 A completed audit report must be submitted to Energy Safety Canada within 21 days from the last day of onsite data gathering activities.
- In extenuating circumstances, where the auditor requires more time to complete report writing, prior approval may be requested of Energy Safety Canada and the governing body. This approval is not guaranteed.
- 2.1.7 Corrections of any deficiencies identified in the audit report as a result of the Quality Assurance (QA) review, must be submitted within 15 days from the feedback date. This cycle of QA review and report resubmission may take up to 90 days total.
- In extenuating circumstances, where the auditor requires more time to complete corrections of the deficiencies, prior approval may be requested of Energy Safety Canada and the governing body. This approval is not guaranteed.
- 2.1.8 An employer may choose to recertify early by conducting an external audit in a maintenance year.<sup>2</sup>

## 2.2 Who Can Conduct Maintenance Audits

- 2.2.1 COR maintenance audits can be conducted by:
- An Energy Safety Canada certified external auditor.
  - An Energy Safety Canada certified internal auditor for the employer seeking the Maintenance Audit.
  - An external or internal auditor candidate seeking auditor certification through Energy Safety Canada's Certified Health and Safety Auditor Program.
  - In circumstances where there is shared ownership between employers, a certified internal auditor for one employer may wish to complete the SAC-CFT-095 Internal Auditor for Multiple Companies Application form and the SAC-CFT-020 Application to Conduct a Group Audit of Related Employers.
  - Internal auditors are not permitted to perform audits on multiple employers unless they apply for and are approved to do so.

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## 2.3 Audit Sampling for Maintenance Audits

### 2.3.1 Maintenance audits must be conducted on active work sites.

- Workplace activities must be representative of the employer's operations, including fixed and field sites as appropriate to the nature of their work.
- An employer operating in seasonal industries, temporary worksites, or who experience frequently changing activity levels due to changes in the general economic conditions may audit based on their best estimate of high to medium activity. The employer must still have at least one active worksite.
- An employer acquiring or developing new operations, such as additional industries, new facilities, or new services offered, may be required to perform a certification audit instead of a maintenance audit. Such changes must be communicated to Energy Safety Canada prior to registration of the audit.

### 2.3.2 An employer experiencing a significant reduction in their operations, to the point where they have no active worksites, or where their activity level is so low that it is no longer representative, may still conduct a maintenance audit with prior approval. Energy Safety Canada will grant this approval if the employer can demonstrate that this impact is temporary and not a shift in what would be considered a new normal in worksite activities.

### 2.3.3 The maintenance audit must cover the same scope of operations as the original certification audit.

- This includes certification audits that covered multiple industry classifications, multiple WCB accounts, or provincial jurisdictions.
- This does not include a certification audit carried out as a group audit of related employers where maintenance audits can be carried out on individual employers<sup>3</sup>.
- An employer who acquires new operations (e.g. additional industries, new facilities, etc.) may require a new external audit to certify the expanded scope of their business. Energy Safety Canada must be notified immediately if there is such a change.

## 2.4 Active Worksites in Other Provinces

### 2.4.1 An employer or auditor may apply to Energy Safety Canada using the SAC-CFT-049 application to extend the audit scope to include field sites located in other provinces. Such a request may be made only if there are no active field sites within the provinces they are maintaining a COR.

### 3.0 OPTIONS TO MAINTENANCE AUDITS



There is an audit option that may be used in place of the maintenance audit. This is available for employers who meet the pre-set criteria.

#### 3.1 Action Plan

3.1.1 To be eligible for an Action Plan, in lieu of a maintenance audit, an employer must request approval from Energy Safety Canada by January 31. To use an Action Plan to maintain their COR the company must meet necessary requirements outlined in SAC PRO-013.

### 4.0 ROLES & RESPONSIBILITIES FOR MAINTENANCE AUDITS



<p><b>Employer</b></p>	<ul style="list-style-type: none"> <li>• Selects one of the following to conduct the maintenance audit:             <ul style="list-style-type: none"> <li>○ An employee who has recently completed the Energy Safety Canada auditor training, or</li> <li>○ Contract the services of an Energy Safety Canada certified external auditor.</li> </ul> </li> <li>• Ensures they arrange for their audit to be completed by their anniversary date on their COR certificate or within the quarter that their anniversary date falls in.</li> <li>• Provides the auditor with the necessary information required to complete their audit.</li> <li>• Submit all required fees to Energy Safety Canada.</li> </ul>
<p><b>Auditor</b></p>	<ul style="list-style-type: none"> <li>• Initiates a plan with the Employer regarding the scope of the audit.</li> <li>• Registers the audit with Energy Safety Canada.</li> <li>• Auditors may include an audit plan proposing an interview and work site sampling to confirm compliance to Energy Safety Canada standards as part of the audit registration process.</li> <li>• Uses the current Energy Safety Canada COR audit protocol to conduct the audit.</li> <li>• Ensures that the onsite data gathering activities do not exceed 45 days.</li> <li>• Submits the completed audit report to Energy Safety Canada within 21 days of the last day data gathering.</li> <li>• Addresses any deficiencies identified in the audit QA review within 15 days of notification.</li> <li>• Communicate to Energy Safety Canada if any major changes to the scope of the Audit occurs. (E.g., Audit type, adding or removing WCB account information, start dates)</li> <li>• Provides the employer with the final audit report.</li> <li>• The final audit report is provided after the audit QA review is complete so that it includes any corrections or additions arising from the audit QA review.</li> </ul>

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<p><b>Energy Safety Canada</b></p>	<ul style="list-style-type: none"><li>• Communicates COR maintenance requirements to employers.</li><li>• Sends a reminder to COR holders of this requirement prior to their anniversary date of their COR.</li><li>• Receives and approves the audit registration request.</li><li>• Reviews any Audit Plans for team or complex audits.</li><li>• Performs an audit QA review in accordance with the Energy Safety Canada audit QA review procedure once the audit is submitted.</li><li>• Provides timely feedback to the auditor</li><li>• Provides notice to the auditor and the employer once Audit QA review is complete.<ul style="list-style-type: none"><li>○ This notice informs both parties of the requirement that the employer must receive the final version of the audit report from the auditor after QA review is complete.</li></ul></li><li>• Registers the completion of a maintenance audit with the appropriate governing bodies.</li><li>• In the event that an employer fails to conduct or provide a successful Maintenance Audit within the calendar year (at least 60%), Energy Safety Canada:<ul style="list-style-type: none"><li>○ Informs the employer that their COR is no longer valid.</li><li>○ Removes the employer from the official list of Energy Safety Canada COR holders.</li><li>○ Informs the relevant governing bodies that the employer's COR has been cancelled.</li></ul></li></ul>
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## 5.0 REFERENCE DOCUMENTS

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SAC-PRO-001 Certification Audit

SAC-PRO-022 Maintenance Audit

SAC-CFT-095 Internal Auditor for Multiple Companies

SAC-CFT-020 Application to Conduct a Group Audit of Related Employers

SAC-PRO-054 Group Audit of Related Employers

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