

Preparing for the “Certificate of Recognition” (COR™) External Audit.

Over the past 5 years or so, I have been directly involved with multiple Certificate of Recognition (COR™) internal and external audits. During this time, I have seen some fantastic improvements in the understanding and implementation of health and safety programs within companies that had nothing or very little truly in place. However, on the other hand I have seen poor performers attempting to pass what they think is a “soft audit” - you know the ones where they send random safety documents from the internet to pass the pre-qualification.

With COR™ this could not be further from the truth and can be a very costly and timely mistake!

When it comes to COR™, the program is designed to test the *communication, implementation and strength of a company's health and safety program across all levels of the company, yes, all levels! It is hard work and can not be fluffed!*

This means that senior management must have a strong commitment and understanding of the COR™ program in Ontario, have staff and resources in place to manage the day to day monitoring and maintenance of the program and make time to read their own company program, crazy eh?! All supervisors (not just the site supervisor) must know and understand that they have very clear responsibilities for their workers on the jobsite and that safety is not a choice for them to fulfill. It is a legal requirement under the Occupation Health and Safety Act and its applicable Regulations.

Safety on the project is everyone's responsibility and includes workers, supervisors, suppliers of services, clients and others. This is known as the “*Internal Responsibility System*”. Safety must be high priority especially if your company is the “Constructor” on the project. Workers must understand the requirements on site, work safe, report hazards or incidents, take the time to participate and ask questions if they do not understand and exercise their basic right to refuse UNSAFE work. By doing this, companies are more likely to develop safe work practices and procedures with the input of the personnel doing the work. This two-way communication and “*Humanization of our workforce*” is what we need to focus on, as it seems we are becoming employee numbers or union floaters, not people.

To achieve the standard required to earn the COR™ certification, a company must showcase their program via documentation, worker and management level interviews and most importantly, how well this is applied on the project, yard or office via workplace observation.

The first step starts with a solid program that reflects the scope of work your company performs on and off the project (the full scope, not only self performed work). Then you must show it has been implemented for a year or so. This is done by having all the required forms, checks and balances completed in a regular, consistent fashion as outlined in the Regulations and the company health and safety program. Everything must be signed and dated. This documentation forms not only audit validation but it is what we in the industry call showing “*due diligent behaviours*”. This is gold!

Next be sure your employees have been orientated to the program and where to find any relevant information and resources. Be sure you address safety concerns that may be present as it is extremely common for both workers and supervisors to disclose concerns during audit interviews - this is a nervous response to being interviewed. It is important workers and supervisors feel they can have the issues

addressed in-house prior to an incident, or an audit. Remember interviews are random at the external audit level so be sure your team knows and uses your program.

Lastly, however I feel the most important and weighted part of the audit is site observations.

My first observations on the jobsite, yard or office during auditing include:

What is the scope of work?

Who is performing the work and how many workers?

What materials or equipment are being used?

How are combustibles and chemicals stored on this project etc.?

What are the Regulations and the company's safety program telling me I should be seeing? (This should include being orientated to the project on arrival).

Do the observations match the documentation submitted for audit?

I call it "The Doing Program". Are you *doing what you say* and does what you say *meet or exceed the minimum requirements of the law and the additional requirements for COR certification in Ontario*? The paperwork is only that – paperwork. It is what is happening at the worker level that will make or break the company and the audit as well.

Remember, you must know what is in your program and have practiced it on all sites with ALL staff before submitting a request for an audit. Re-audits are not a freebee and can delay timelines considerably when COR™ is required for tender purposes. The program requires dedication and resources from senior management and supervisors, if it is to become a true company safety culture. You do not need to be perfect, however you must follow the program to obtain the marks required for success.

For further information or consultation on preparing for or obtaining your Certificate of Recognition (COR™) email info@icihealthandsafety.com. Be sure to follow us on Twitter @icihealthSafety for free tips and our monthly newsletter.

Heidi Brookes P.GSC, CSC, NCSO.

Lead Auditor / Consultant/IHSA Associate External Auditor.

