



Developing and Implementing

an

Audit Program



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What is an audit?

- An inspection or examination of a building or other facility to evaluate safety, quality, efficiency, or the like:

- An audit is an evaluation tool





If properly implemented, audits can be safety's version of a multi-tool!

Assist in identifying hazards and evaluating risks associated

Establish a system of responsibility and accountability

Identifying necessary controls and evaluate effectiveness of those in in place

> **Identify solutions to issues** and problems

Evaluate Competencies and level of Awareness for safety processes

Evaluate level of active participation and management commitment



Training Opportunities

Determine state of compliance with **Regulatory Standards**

Determine of state of compliance with Company Standards

Identify/Communicate outstanding practices across organization

> **Provides a system to measure** continuous improvements

Benchmark performance across multiple facilities

Determine level of employee Engagement in safety processes

An Audit is NOT a paperwork exercise!



- Verification & Validation
 - Management Interviews
 - Employee Interviews
 - Visual Inspection
 - Practice Exercises/Drills
- Documents/Records
 - What documents should be reviewed
 - What records should be reviewed

- Determine Scope
- Identify Applicable Rules & Regulations
- Identify/Develop Checklists and Forms
- Identify types of evidence required for verification/validation
- Select and train audit team members
- Develop provisions for reporting findings
- Develop provisions for corrective actions
- Determine applicable measurements
- Audit & report

Developing Audit Checklist

Why do we need checklists?

EIPMS Audit Checklist - Policy								
Ranking Definitions: 0. No parts of element in place. Needs development 1. Some parts of element in place. Needs improvement. 2. Element is functional 3. Outstanding practices in place for element								
NO.	Question	Evidence	Minimum Criteria for Level 2		Currently in Place		in	Comments
					Rank 0 - 3 as defined above			
				N/A	0 1	1 2	3	
4.2	OH&S Policy							
2	Does the location have an occupational health and safety policy that is authorized by the organization's top management that clearly states overall health and safety objectives and a commitment to improving health and safety performance?	Policy	Policy exists and is authorized by the current top management at the location being assessed Policy states objectives (what is going to be done), not just a "mssion statement"					
3	a. Is the policy appropriate to the nature and scale of the organization's OH&S risks?	Policy, discussion with organization leadership	Hazard ID and Risk assessment as a foundation of the management system is addressed Policy is: - Consistent with vision of the organization's future - Realistic - Neither overstates or trivializes nature of the organization's risks					
4	b. Does it include a commitment to continual improvement?	Policy	Commitment to continual improvement clearly stated in policy					
5	c. Does it include a commitment to at least comply with current applicable OH&S legislation and with other requirements to which the organization subscribes?	Policy	Clearly stated in policy					
6	d. Is the policy documented, implemented and maintained?	Policy, discussions with leadership	Documented policy exists Management can relate how policy is implemented and maintained; objective evidence indicates actual practices are consistent with policy					
	e. Is the policy communicated to all employees with the intent that employees are made aware of their individual	Documentation of policy communication (meeting agendas, etc)	A preponderence of employees can describe the policy in general terms and specifically relate their reconscibilities (consistent with these					

EIPMS Audit Checklist - Planning for Hazard Identification, Risk Assessment and Risk Control

- Ranking Definitions:

 0. No parts of element in place. Needs development

 1. Some parts of element in place. Needs improvement.
- 2. Element is functional
- 3. Outstanding practices in place for element

NO.	Question	Evidence	Minimum Criteria for Level 2		1	rently Place	Comments
						k 0 - 3 red abo	
43	Planning for Hazard Identification, Risk Assessment and	Rick Control		N/A	0 1	. 2	3
10	Has the organization established and maintained procedures for ongoing identification of hazards, the assessment of risks and the implementation of necessary control measures?	Applicable documents and records (Procedure 1 equivalent, etc.) List of hazards Exposure assessment records (noise, chemical, temperature, light) Discussions with safety coordinator, core team leader Records documenting implementation and maintenance of planning as defined by 4.3.1	Evidence shows that procedures are in place, and actual practices conform to any written procedures or documentation. Scope of hazard id and risk assessments are clearly defined (including what is excluded) Evidence shows that the process is ongoing and proactively addresses changes that occur throughout the year, not just at the annual review List of hazards is available (Hazard column on risk assessment is acceptable) Exposure assessments, appropriate to potential environmental hazards at the facility, have been conducted Cannot be scored at 3 or higher unless hazard id and risk assessment have been completed for all processes and operations with the scope of the organization's EIPMS				
11	a. Does the procedure include routine and non-routine activities?	Ditto, plus Discussions with managers and employees about routine and non-routine activities, knowledge of types of non-routine activities that typically occur in the type of organization being assessed Ditto	Evidence shows that hazards relating to routine AND non routine (including emergency and startup from emergency) activities are identified, risks assessed, and control measures identified. (Note-Ranking of less than 2 on this line item must be identified as a "Major" Non Conformance)				
12	b. Does it include activities of all personnel having access to the work place (including subcontractors and visitors)?	Discussions with management to identify contractor and vendor activities	Evidence shows that activities of contractor and visitor personnel have been included in the planning process				
13	c. Do these procedures include facilities at the workplace, whether provided by the organization or others?	Ditto, plus Discussions with managers and employees about existence of facilities owned or controlled by other organizations.	Evidence shows that facilities provided by others (if applicable - for example, operation controlled by another organization that is not included in the scope of this EIPMS, such as mowing services sometimes hired by the farms) have been included in hazard id/risk assessment activities				
14	d. Has the organization ensured that the results of the assessments and the effects of the controls are considered when setting OH&S objectives and does the organization document and keep the information up to date?	OH&S objectives and documentation of considerations, decision-making process, etc. Hazard lists Discussion with core team members re: objective setting process	Evidence shows that results of assessments are considered in objective-setting, including at least 75% of objectives derived from high-priority risks.				
	Has the organization's methodology for hazard identification and risk assessment been:						
15	a. Defined with respect to its scope, nature and timing to ensure it is proactive rather than reactive?	Applicable procedures and supporting documents Discussion with core team members Discussions with engineering manager regarding changes and new facilities	Evidence shows hazard id and risk assessment is defined as required and is proactive - pay particular attention to changes (in equipment, process, work methods, etc.) Identification and assessments process is at a high enough level to identify plant- and area-wide hazards in addition to task-specific hazards (JHA/JSA alone does not meet the requirements of this element) (Note-Ranking of less than 2 on this line item must be identified as a "Major" Non Conformance)				

EIPMS Audit Checklist - Operational Control

Ranking Definitions:

- 0. No parts of element in place. Needs development
- 1. Some parts of element in place. Needs improvement.
- 2. Element is functional
- 3. Outstanding practices in place for element

NO.	Question	Evidence	Minimum Criteria for Level 2			rrentl Place		Comments
				N/A	def	nk 0 - ined al	ove	
4.4.6	Operational Control			14/12	•		•	
60	Has the organization identified those operations and activities that are associated with identified risks where control measures need to be applied?	Risk ID and hazard assessment documents and records Discussion with safety coordinator and core team Review of safety procedures and associated documentation (including summary of safety operational controls) Review of maintenance procedures and practices, especially safety related work orders Review of incident investigations	Evidence that criteria are met. Including existence of up-to-date Summary of Safety Operational Controls for routine, non- routine and emergency situations					
	Does the organization plan these activities, including maintenance, in order to ensure that they are carried out under specified conditions by:							
61	Establishing and maintaining documented procedures to cover situations where their absence could lead to deviations from the EIPMS policy and the objectives? Stipulating operating criteria in the procedures?	EIPMS Policy Review of operating procedures and instructions Observation of actual practices vs. operating procedures (including procedures to control non- routine and emergency situations, to include startups following emergency situations) Results of completing "Operational Controls Checklist" Review of incident investigations. Hazard ID and risk assessment records.	Evidence shows that situations where the lack of a documented procedure could result in a deviation from EIPMS policy or objectives are covered by a documented procedure. - All risks that require operational controls to reduce risk to an acceptable level have associated documented procedures (includes risks of permanent disability or death identified in hazard id/ risk assessment, known risks based on generally accepted industry practices, and risks brought out by employees sustaining serious injuries.) Operational Controls Checklists score of at least 80% (Note-Ranking of less than 2 on this line item must be identified as a "Major" Non Conformance) - Where applicable, operating criteria relevant to minimizing risk of injury and illness are specified in the documented procedures.					
		Hazard identification and risk assessment Review of relevant procedures and practices						

	EMERGENCY ACTION PLANS - Every employer is covered.						
	An employer who demonstrates compliance with the exit route provisions of NFPA 101-2000, Life Safety Code, will deemed to be incompliance with 1910.34, 1910.36 and 1910.37						
	Does the employer have a written Emergency Action Plan?	Υ	N				
1	Employer must produce a written plan of the facility and must be current. Plan should be dated with name of reviewer. Plans with other facilities location name is not acceptable. EAP minimum elements will include foreseeable potential emergency situations that would reasonably occur at the location						
	Procedures for reporting a Fire or other emergency	Y	N				
2	Does EAP provide clear instructions for reporting emergencies. Key contact numbers during normal and after hours. Location protocols and emergencies service will be included in EAP. In general likely emergencies in the food industry would be fire, flood, tornado, chemical spill/release, food security, bomb threat, power failure, severe weather/tropical storm, workplace violance						
	Procedures for emergency evacuation, including type of evacuation and exit route assignments	Υ	N				
3	Section should describe evacuation routes and shelter in place locations and alternate locations. Plan should include maps of the facility and assembly locations.						
	Procedures to be followed by employees who remain to operate critical plant operations before they evacuate						
4	EAP program will include specific roles and responsibility of individual employees by position or name, if name is used program must be current. Interview employee(s) to verify training. Review training records of material covered.						
	Procedures to account for all employees after evacuation						
5	EAP program will include specific action for accounting for all employees and how the information is communicated.						
	Procedures to be followed by employees performing rescue or medical duties	Υ	N				
6	Specific protocols for employees who perform these responsibilities will be included in the EAP and explain in detail what rescue and medical first aid duties are to be performed and by whom. A response to a HAZMAT situation will be located in the Emergency Response Program (1910.120 (q)).						

- Auditors / Audit Teams
 - Auditors must be trained and competent in the area/sections of the audit that they are examining and understand verification/validation requirements
 - All audits are lead by a certified auditor
 - Responsible for team selection and training
 - Responsible for integrity of the audit system
 - Completes and distributes the final report
 - Table of Findings, Summary of Major Non-conformances & Outstanding Practices
 - Lead auditors go through 3 step certification process
 - Initial Management Systems Training
 - Lead Auditor Training
 - Practical Application/Certification Audit
 - Lead auditors recertification
 - Attend Annual refresher training
 - Conduct Annual Certification audit

- Measuring/Scoring
- Responsibility & Accountability
 - Continuous Improvement



THANK YOU!

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