ENFORM

ENFORM HEALTH AND SAFETY PROGRAM CERTIFICATIONS
POLICY & PROCEDURE:

3.24 Audit Sampling

Background

It is important that the auditor conducts employee interviews and work site sampling that sufficiently represent the employer's workforce and operations covered by the scope of the audit. All audits completed for certification or maintenance of COR, SECOR or MECOR must be completed using the same basic auditing principles and standards in order to ensure the integrity of the audit process and the credibility of audit results. The following policy and procedure sets out the factors that must be considered in developing representative samples for audit interviews and work site sampling. This also stipulates minimum interview and work site sampling standards required to meet Enform's audit standards.

Policy

3.24.1   When selecting their interview sample, auditors must use representative sampling that reflects both the size and complexity of the organization being audited. Interviewees should not be selected based on availability or knowledge of the health and safety systems. To be representative, the interview sample must include employees from:

    3.24.1.1   All departments.
    3.24.1.2   All shifts.
    3.24.1.3   All employee levels (include a cross section from every staffing level including senior and middle management, supervisors, and workers, including contract, part time, and casual employees).
    3.24.1.4   All types of work (if the audit covers multiple provinces, WCB accounts and/or industry codes or classification units, include personnel from each of these).
    3.24.1.5   A representative number of work sites (see 3.24.10).
    3.24.1.6   Company history (if the company has been through a recent reorganization or restructuring, include both "old" and "new" parts of the company).

3.24.2   The minimum number of interviews that must be conducted is determined by an employer's total number of employees.

    3.24.2.1   The minimum number of interviews based on the total number of employees can be found in Appendix F1: Audit Work Site and Interview Sampling Tables.

3.24.3   The auditor may be required to exceed the minimum number of interviews based on the total number of employees in order to meet the sampling requirements listed in 3.24.1.

3.24.4 The choice of which employees to interview is to be selected by the auditor prior to starting the audit.

3.24.5 All interviews must be carried out face-to-face by the auditor.
3.24.5.1 The use of interview questionnaires is not approved for Enform audits.

3.24.6 Telephone interviews may be considered only in extenuating circumstances (i.e. senior management personnel or highly specialized individuals are unavailable due to their work location during the course of the audit).

3.24.6.1 The use of telephone interviews requires prior approval from Enform and the rationale for these exceptions need to be noted in the audit report.

3.24.6.2 Telephone interviews cannot be used as a substitute for a work site visit required to meet representative work site sampling.

3.24.7 The auditor should provide an audit plan during audit registration that includes a proposed interview sampling plan if auditing large and/or complex operations.

3.24.7.1 Enform will provide guidance to an auditor that submits an audit plan to ensure interview requirements are fully understood in advance of the audit.

3.24.8 Work site sampling must be representative of the overall operations covered by the scope of the audit. To determine representative work site sampling auditors must, as a minimum, consider the following criteria (see Appendix F for more detail):

3.24.8.1 All activities under applicable WCB account(s) and industry code(s) or classification unit(s).

3.24.8.2 Work site size differences.

3.24.8.3 The diversity of work conditions from one work site to another.

3.24.8.4 The location of the work sites.

3.24.8.5 The minimum number of work sites to be sampled as required by the governing bodies.

3.24.8.6 For multi-jurisdictional audits, work site sampling must cover a sampling of all provinces.

3.24.9 Employers with 3 to 30 fixed manned sites where employees are stationed on an ongoing basis must include **all** work sites as part of the audit scope over the course of the 3-year audit cycle.

3.24.9.1 Unless they are including all work sites inside the scope of their certification audit, and employer with more than 2 sites cannot use the same combination of sites for COR certification that were audited for the previous certification.

3.24.9.2 An employer with more than 2 work sites must include their main office or shop in each province as part of the work site sample every year. If an employer has 2 main offices/shops in a province, each main site should be included as part of the audit scope every other audit year.

3.24.9.3 If an employer's audit scope is larger than 30 sites, the employer/auditor must consult with Enform to determine the representative sampling by completing an audit plan. Enform may consult with the governing bodies to determine an appropriate sampling methodology for these employers.

3.24.10 In cases where the activities (conditions, location, type of work, work site size, number of employees, etc.) inside the employer's scope of operations are not consistent across sites, multi-site audits may require a sampling of more than the minimum number of work sites to be representative. Employers/auditors should consult Enform to determine adequate work site selection.

3.24.11 Employers that have employees perform work at field work sites; operate mobile equipment; and motor vehicle fleets, including commercial vehicles, must consider these as work sites and have these accounted for under the work site totals.
3.24.11.1 Where there is potential for more than 30 of these types of work sites the auditor must contact Enform for guidance and submit an audit plan.

3.24.12 Employer-owned work sites which may be intermittently visited/serviced by workers, but employees are not stationed there on an on-going basis must be included in the scope of the audit if applicable to the WCB account and industry code(s) or classification unit(s) being audited; however, there is no minimum sampling requirement for these work sites. Employers/auditors must determine appropriate sampling through consultation with Enform to complete an audit plan to determine a reasonable sample.

3.24.13 Worker home office sites are not considered to be work sites unless they are owned by the employer. A representative sample of workers who work from their own home office sites should, however, be included in the interview sampling.

3.24.14 Mobile equipment and vehicles are not considered work sites for the purposes of representative site sampling. They are not subject to minimum site-sampling requirements, but representative sampling of operators should be included in the interview process.

3.24.15 Special sampling guidelines apply where staffing agencies (under industry codes 86906 and 86911) provide temporary labour for another employer's operation. (See Appendix F2.)

2.1.13.1 Site observations must be conducted where possible, but are not subject to minimum site-sampling requirements. Sites should be selected based on level of risk.

2.1.13.2 Temporary employees of a staffing agency that are sent to off-site locations to work for another employer should be categorized separately inside the auditor's sampling table (i.e. the total number of temporary employees and the number of sampled temporary employees should be listed as a separate category of employee inside the auditor's sampling table).

2.1.13.3   Interview sampling for these temporary staffing agency employees is calculated in addition to the minimum required for the sampling of permanent staffing agency employees (as per Appendix F2). The number of temporary employees sampled must be at least equivalent to the number of permanent agency employees sampled.

2.1.13.4   Interviews do not have to be held on the work site.

2.1.13.5   Interviews of temporary workers will focus on orientations, emergency response, hazard assessment, job-specific training provided, right to refuse unsafe work, PPE, injury reporting, MSDS and WHMIS. A separate set of interview questions may be provided. Any findings specific to temporary staffing agency workers must be documented inside auditor notes.

3.24.16 The auditor should provide an audit plan during audit registration that includes a proposed work site sampling plan if auditing employers with more than 30 sites and/or complex operations.

3.24.16.1 Enform will work with any auditor that submits an audit plan to ensure work site requirements are fully understood and in advance of the audit.

3.24.17 The auditor must report and demonstrate compliance with the above sampling standards by tracking their interviews and all work sites (visited and not visited) within the Enform COR Audit Protocol.

3.24.18 Enform will confirm compliance with the interview and work site sampling standards through the audit quality assurance (QA) review process.

3.24.18.1 An audit cannot pass Enform's audit QA review process if it does not comply with the interview and work site sampling standards.

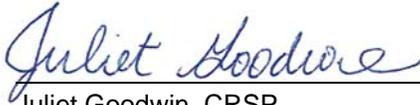## Procedure

The auditor:

- Conducts sufficient employee interviews and work site sampling as per the above policy and procedure.
- Contacts Enform for guidance and submits an audit plan prior to the start of the audit, as required in the above policy and procedure.
- Communicates with Enform any changes to the approved audit plan during the course of the audit.
- Includes auditor notes that are in compliance with the above policy when submitting their final audit report. Also, if an audit plan was approved this should be noted within the final audit report.

Enform will:

- Provides the Appendix F1: Audit Worksite and Interview Sampling Tables and Appendix F2: Auditing Staffing Agencies to auditors through the Enform website and as requested.
- Provides guidance to auditors that submit an audit plan for interview and work site sampling, as required in the above policy and procedure.

- Approves completed audit plans prior to approving an audit registration, as required in the above policy and procedure.
- Ensures compliance with the above auditor notes policy in the course of their audit QA review.
- May provide specific and/or general feedback to the auditor to correct or improve auditor notes as part of the audit QA review cycle.

Approval

Juliet Goodwin, CRSP
Manager, Safety Audits and Certifications

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Appendix F: Audit Worksite and Interview Sampling Tables

Criteria for Determining a Representative Interview Sample

The interview sample contained within the audit scope must be representative of both the size and the complexity of the organization being audited. All business units and levels of the organization must be reflected in the sample.   **Depending on the nature of the operation, sample sizes above the suggested minimums may be required.**

To be "representative" the interview sample must consider all of the following variables:

- **Number of years employees have been with the company** – include a cross-section of everyone from new hires to experienced personnel.
- **Department** – include personnel from **all** departments.
- **Levels of Personnel** – include a cross-section of personnel from every staffing level, management to workers, including part-time and casual. When the audit scope encompasses more than one work site, include a sampling of personnel from each work site included in the scope of the audit.
- **Shifts** – include a sampling of employees from **all** shifts.
- **Company History** – if the company has recently undergone reorganization or other restructuring, include personnel from both the "old" and the "new" parts of the company.
- **WCB Account/Industry Codes** – when the scope of the audit encompasses more than one WCB account and/or industry code, include a sampling of personnel from all WCB industry codes.
- **Sites** – The number of sites included in the audit must be representative of the overall company operations (see Criteria for Determining Representative Site Sampling). Interview sampling is always based on total employee numbers, not the total number of employees working at the sites included in the current year's audit.

Total Staff	Minimum Interviews	Total Staff	Minimum Interviews	Total Staff	Minimum Interviews
>5	all	234-240	35	560	66
5	4	241-249	36	561-570	67
6-7	5	250-299	37	570-580	68
8	6	300-302	38	581-595	69
9	7	303-309	39	596-605	70
10-11	8	310-312	40	606-615	71
12-14	9	313-315	41	616-625	72
15-16	10	316-320	42	626-638	73
16-17	11	321-325	43	639-645	74
18-20	12	326-329	44	646-655	75
21-24	13	330-332	45	656-665	76
25-27	14	333-335	46	666-678	77
28-30	15	336-338	47	679-689	78
31-36	16	339-341	48	690-699	79
37-44	17	342-348	49	700-705	80
45-49	18	349-354	50	706-719	81
50-64	19	355-359	51	720-729	82
65-74	20	360-364	52	730-740	83
75-88	21	365-369	53	741-749	84
89-99	22	370-374	54	750-790	85
100-120	23	375-379	55	791-840	86
121-149	24	380-389	56	841-959	87
150-199	25	390-399	57	960-1000	88
200-204	26	400-475	58	1001-1499	89
205-209	27	476-499	59	1500-1800	90
210-212	28	500-510	60	1801-2500	91
213-214	29	510-519	61	2500-4000	92
215-220	30	520-529	62	4001-4999	93
221-222	31	530-539	63	5000-9999	94
223-226	32	540-549	64	10000-24999	95
227-230	33	550-559	65	25000+	96
231-233	34				

Interview subjects are selected by the Auditor. This may be done in consultation with the employer. Also, the Auditor must demonstrate within the audit protocol or audit summary that the sample size used for the number of interviews is in agreement with the criteria presented in this document.

To avoid any confusion over sampling requirements, please contact Enform for assistance in determining a representative sample prior to proceeding with the audit.

Criteria for Determining Representative Work Site Sampling

For the purposes of a Partnerships Health and Safety Audit, a "work site" will be defined as "any location where a worker is, or is likely to be, engaged in any occupation for their employer."

Work sites included in the audit must be representative of the overall company operations. The following criteria shall be used to determine what work sites to include in the scope of an audit.

- Where multiple industry codes/accounts are being included in the scope of the audit, activities under all applicable accounts and industries must be represented in the site sampling.
- If the size of the work site or the number of workers at each site differs greatly from one site to another, the work sites included in the audit must include a cross section of sites that represent these differences.
- Include any sites where conditions may vary or are not consistent with the majority of sites inside the operation (e.g. hazards, geographic location).
- The main office/shop complex must be included in the scope of every audit (both certification and maintenance years). The minimum number of sites required for each annual audit must include the main office/shop complex. If two main offices/shops exist, alternate site visits from one main site to the next on a rotating basis.
- Taking into consideration all of the above criteria, the number of work sites included in the scope of the audit must also meet established minimums. If the scope of the audit includes:
  - 2 sites, all sites must be visited.
  - 3-4 sites, at least 2 sites must be visited.
  - 5-8 sites, at least 3 sites must be visited.
  - 9 -30 sites, a third of the sites must be visited (calculations must be rounded *up* to the nearest whole number).
- Where an employer's operation is composed of 3-30 fixed sites, all sites will be included in an audit at some point during the 3-year audit cycle.
- In cases where an employer's operation is not consistent across sites with regards to location, working conditions, type of work, number of employees, and work site sizes, multi-site audits may require a sampling of more than the minimum number of sites to be representative. In these situations consult with Enform prior to finalizing site selection.
- If an employer's audit scope is larger than 30 sites, the employer/auditor must consult with Enform to determine representative sampling for the audit. Enform may consult with Partnerships to determine the best sampling methodology for these large employers.
- An employer with more than 2 sites cannot use the same combination of sites for COR recertification that were used as the scope of the audit conducted for the last certification.

Guidelines for Auditing Staffing Agencies
(Industry Codes 86906 and 86911)

The following are suggested guidelines for including temporary workers in staffing agency audits.

Audits conducted on staffing agencies that provide temporary labour to other employers should focus on training of the temporary labour force, pre-assignment assessment processes for client sites, and matching candidates to site requirements.

Auditors should look closely at the content of the health and safety orientation program for temporary workers.

Interview Guidelines

Begin by determining the number of interviews required for full-time company employees. Next determine the number of temporary workers placed at the time of audit. Lastly, determine the required number of temporary staff interviews based on the sampling of permanent company employees: sample at least as many temporary worker interviewees.

Temporary workers are to be reported as a separate worker type/category on the sampling tables (e.g. Contracted Workers, Temporary Labourers). Use only those worker interview questions related to the following content: orientations, emergency response, hazard assessment, job-specific training, right to refuse unsafe work, PPE, injury reporting, MSDS and WHMIS.

Where possible, temporary workers should be interviewed at their work sites.

Site Visits

Where staffing agency client work sites are available for observations, sites should be chosen based on the types of work performed, size, frequency of assignment, and geographic location. Also, where possible, consider which sites contribute the highest relative proportion of claims.

Auditors must keep in mind that they are not auditing the staffing agency's client. They are simply observing the work environment of the temporary employee(s).

To avoid any confusion over interview or work site sampling requirements, please contact Enform for assistance in determining a representative sample prior to proceeding with the audit.