

VEEP THIRD PARTY AUDIT GUIDANCE FOR MENTORS



PURPOSE

The purpose of this document is to provide guidance for Virginia facilities that are seeking a third party audit of their EMS for VEEP membership from a mentor or other volunteer auditor. The guidance also addresses the minimum of what an auditor should address in the course of a third party audit. When a third party audit is conducted outside of the ISO 14001 certification process, the audit should focus on conformity to that individual facility's procedures and requirements. Third party EMS audits are conducted to determine conformance of the system and are not compliance audits.

DEFINITIONS

Audit: A systematic, independent, and documented process to: obtain audit evidence; evaluate it objectively; and determine the extent to which audit criteria are fulfilled.

Audit Conclusion/Recommendation: Outcome of an audit provided by the auditor/audit team after consideration of the audit objectives and all audit findings.

Findings: Results of the evaluation of the collected audit evidence against audit criteria. Can indicate conformity or non-compliance with audit criteria or opportunity for improvement.

Major Nonconformity: Absence or total breakdown of a system to meet a requirement.

Minor Nonconformity: Single observed lapse or isolated incident. Failure to comply with a requirement which is not likely to result in management system failure.

Opportunity for Improvement: A conforming practice that is weak and could result in future nonconformities.

VEEP REQUIREMENTS

E4 facilities are required to submit documentation showing that they have completed at least one full cycle of an EMS which has been verified to be effective and meet or exceed E4 requirements by an unrelated third party. DEQ defines the term "unrelated third party" in the context of VEEP to mean that the EMS auditor(s) is not directly employed by the applying facility nor have they played a substantive role in developing the facility's EMS.

In addition, DEQ requires that third party auditors be qualified for their role in assessing the EMS by meeting the requirements below:

- ☛ Qualifications for Lead Auditor:

- Training: 32 to 40-hour RABQSA Accredited ISO 14001 EMS Lead Auditor Course or IPC (formerly IATCA) EMS Lead Auditor Courses (must receive passing grade on course examination)
- Work Experience: Five years of work experience in environmental management, environmental science and technology, environmental regulation or related field.

- ☛ Qualifications for Audit Team Members:

- Training: Same as qualifications for Lead Auditor
- Work Experience: Three years of work experience in environmental management, environmental science and technology, environmental regulation or a related field.

GUIDANCE FOR AUDITORS & AUDITEE

Principles of Auditing:

- ☛ Principles relating to auditors:
 - Ethical Conduct: This includes reliability, honesty, confidentiality, and discretion.
 - Fair Presentation: The obligation to report truthfully and accurately.
 - Due Professional Care: Applying diligence and judgment in auditing.
- ☛ Principles relating to the audit:
 - Independence: Impartiality of the audit and objectivity of the audit conclusions.
 - Evidence-Based Approach: Rational method for reaching reliable audit conclusions.

Audit Activities and Process:

- ☛ Audit is initiated: Auditor and auditee determine audit objectives, scope, and criteria.
- ☛ Auditor conducts document review: Note that this can be done off-site.
- ☛ Auditor prepares for and conducts on-site audit:
 - Including: opening meeting, collecting and verifying information, interviewing staff, generating findings, preparing audit conclusions, and conducting a closing meeting.
- ☛ Auditor prepares and distributes the audit report:
 - Auditor indicates if findings are conformities, nonconformities, or opportunities for improvement. Nonconformities may be graded as “minor” or “major”.
 - Auditor should specify nonconformities by location, functions, or processes. The audit report should include all nonconformities and opportunities for improvement.

Common Audit Components:

- ☛ Review the EMS Manual and other EMS documentation.
 - Not all procedures have to be documented.
 - If a certain process isn’t documented, the auditor may need to interview more people to ensure that the issue is handled consistently.
- ☛ Review the Aspects & Impacts.
 - Significant aspects may help an auditor determine where to focus.
- ☛ Interview Staff.
 - Interviewing staff will help determine the effectiveness of the current procedures.

By the end of the audit, auditors should have a clear sense of the answers to these questions:

- ☛ Do they do what they say?
- ☛ Do they say what they do?
- ☛ Do they meet all requirements?
- ☛ Is the EMS effective at handling their risks?
- ☛ Is there continual improvement?

Audit Report:

- ☛ The audit report should clearly identify if the EMS is considered effective. The audit report should address audit conclusions on the extent of conformity and the effective implementation of the management system. Examples of conclusions include:
 - Effective without conditions (no nonconformities);
 - Effective with minor nonconformities addressed in a corrective action plan; or
 - Not effective at this time due to major nonconformity.