

# **Policies and Procedures Manual - Version 1A**

## **Certificate of Recognition (COR) Program**



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## **Acknowledgements**

go2 would like to thank the members of our Technical Advisory Committees and OH&S Steering Committee for their contribution and advice during the development of our program. We would also like to extend our sincere appreciation to the members of the Certifying Partners Committee that offered input and provided existing resources, in particular, the British Columbia Maritime Employers Association, Construction Safety Network, and the BC Forest Safety Council. Their support has assisted us with the development our program and helped us provide the hospitality and tourism sectors with resources to improve their health and safety programs.

### **go2 as a Certifying Partner**

go2 was created by the BC tourism industry in 2003, on the recommendation of an 18 month task force involving more than 100 industry representatives and stakeholders around the province, to deal with the labour shortage and other HR issues. Through its programs and services, go2, an independent, non-profit industry association, assists BC's tourism industry to recruit, retain and train employees to support industry growth.

### **DISCLAIMER**

The information presented in this document is intended for general use and may not apply to all circumstances. It does not cover all aspects of existing government regulations and does not relieve individuals using this document from their responsibilities as prescribed under applicable legislation. go2 does not guarantee the accuracy or assume liability for the information presented here.

## Introduction

In 2009, go2 signed an agreement with WorkSafeBC to develop an occupational health and safety division to promote WorkSafeBC's services to all tourism and hospitality industry workplaces in British Columbia. In addition to providing resources on reducing injuries and improving workplace safety, a key component of the agreement includes implementing and administering a Partners in Injury and Disability Prevention Program (COR program) for industry employers. go2 will initially deliver the COR program to the following classification units:

- 761017 – Hotels
- 761035 – Restaurants or Other Dining Establishment
- 761034 – Pub, Bar, Nightclubs, or Lounge
- 761038 – Ski Hill or Gondola Ride

This policies and procedures manual was developed to ensure that go2 staff and all go2 certified auditors have current, accurate information about the *Partnerships in Prevention* Certificate of Recognition (COR) program, and the standards that are required to follow. The Quality Assurance program is designed to ensure audits are performed consistently within the guidelines developed by industry and the highest standards are maintained. The manual was developed in December 2009. **Auditors: ensure you are familiar with the requirements in this manual.** The COR Policies and Procedures Manual will continue to be updated as required and made available to all auditors.

## **Audit Process**

### **Certification Audit (External Audit)**

Qualification audits are required in year one and year four of the COR program. These audits will be conducted using the go2's tourism and hospitality industry-specific audit tool and will be conducted by a go2-certified external auditor. The employer must contact go2 when ready to proceed with the external audit.

### **Maintenance Audit (Internal Audit)**

Internal maintenance audits are done in year two and year three of the COR program. Audit documents should be requested from go2 prior to the audit due date. These audits can be done by employees of the company who are go2-certified internal auditors.

### **Minimum Rating for COR Audits**

To meet the minimum COR standards, each audit must:

- Attain 80% overall score,
- Attain a minimum of 51% in each element,
- Meet the established quality assurance standards of both go2 and WorkSafeBC.

### **Timelines for Audit Completion**

After registration to the COR program, an employer must commit to completing their first certification audit within 2 years. If the employer has not completed the certification audit after a period of 2 years, go2 will de-register the employer from the program. The firm will be able to register for the program after being dormant at any time they wish.

The employer must notify go2 of their intention to perform an audit at least 2 weeks in advance of the audit date. The *Notification of Audit* form in must be completed and submitted to go2.

Once the audit has been performed on site by an external auditor, the completed audit report must be submitted to go2 within 45 days of the last day on site or the auditor must receive permission for an extension granted by go2.

## **Below-Standard Audits**

Employers should contact go2 if the audit does not meet minimum standards. Audits that do not meet standards are as follows:

### **70% - 79% Overall Score – Limited Scope Audit**

go2 will send a letter requesting that an action plan be developed to correct the deficient areas of the health and safety program and that a copy be submitted to go2. This action plan must be received by go2 within 45 calendar days from the date the employer receives the initial audit report. Upon acceptance by go2, a limited scope audit will be set up to reevaluate the deficient areas. Where practicable, the same auditor should conduct the audit. The limited scope audit must take place within 90 calendar days of the original audit date. The audit must be submitted to go2 within 45 calendar days of on-site data collection activities. Failure to meet any of these requirements will result in a full audit being required.

When the COR is issued after successful completion of the limited-scope audit, the date that will appear on the Certificate of Recognition will be the date of the original external audit.

### **Less Than 69% Overall Score – Re-audit**

External audits that score 69% or less fail to meet the standard. These audits are required to have their entire health and safety program re-audited at the company's expense. Companies do have the option of changing external auditors.

## **Documentation to be Reviewed**

Review the health and safety program to ensure it includes the following components:

- Company Health & Safety Policy
- Workplace Hazard / Risk Assessment and Control
- Safe Work Practices
- Safe Job Procedures
- Company Rules
- Personal Protective Equipment (PPE)
- Preventative Maintenance Records
- Training and Communication
- Inspection Records / Completed Forms
- Investigations and Reporting
- Emergency Preparedness / Response Plans
- Records and Statistics
- Copies of Legislation
- Safety Committee Meeting Minutes
- Training Records
- Employee / Contractor Orientations
- First Aid Records
  
- Injury Management / RTW Program (separate audit from the Occupational Health and Safety Management program for an additional 5% rebate)

If any of the components noted above are incomplete or missing, the auditor and employer should consider postponing the audit process until corrective actions are undertaken.

## Sampling Techniques

### Why do we sample?

- To become more efficient in our audit practices
- A balance between accuracy and efficiency
- Cost and effectiveness
- Quality

### Determining Representative Samples for Interviews

The interview sample contained within the audit scope must be representative of both the size and 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 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.*

## Determining Interview Numbers

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.

## **Determining Representative Site Sampling**

For the purposes of the COR audits, 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 are to be included in the scope of an audit.

- Employers that operate under multiple classification units (CUs), must ensure activities under all applicable CUs are represented in the site sampling.
- If the size of the work site or the number of employees at each site differs greatly from site to site, the work sites sampled must represent a cross section that reflects these differences.
- Include any sites where conditions may vary or are not consistent with the majority of sites inside the operation.
- The main office / site must be included in the scope of every audit (both certification and maintenance audits).
- Taking the above criteria into consideration, 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 (all calculations must be rounded up to the nearest whole number)
- When 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.
- If an employer’s audit scope is larger than 30 sites, the employer / auditor must consult with go2 to determine representative sampling for the audit.
- 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.

**To avoid any confusion over sampling requirements, please contact go2 for assistance in determining a representative sample prior to proceeding with the audit.**

## **Quality Assurance Process**

### **Background**

Quality assurance is a critical component of the COR program. Working independently, and in cooperation with WorkSafeBC, go2 will perform review and investigation activities to ensure that a high level of confidence is maintained in the accuracy and timeliness of COR records. go2 will maintain records of all quality assurance audits and will provide WorkSafeBC with an annual summary of the quality assurance activities.

### **Quality Assurance Process**

go2 will perform a detailed review of all COR audits, ensuring that audit process deficiencies are remedied as required, so that all audits meet an acceptable standard.

Additionally, go2 will perform verification audits to ensure the auditor's work meets the quality assurance standard.

At least 10 percent of qualified auditors must have their work reviewed by the certifying partner. If go2's verification audit indicates significant variance (lower score) from the audit performed by the qualified auditor, go2 will withhold certification from the employer concerned and conduct further investigations into the conduct of the auditor.

go2 has developed a set of principles and procedures to deal with audit irregularities and auditor conduct. For details of the auditor's code of conduct see the Code of Ethics included in this document.

When requested by WorkSafeBC, go2 may review the audits performed by specific auditors, perform additional audits and/or coordinate the activities of a third party external auditor in order to confirm the validity of the COR certification.

In the event that go2 receives complaints from other employers or the public about the conduct of a COR certified employer or auditor for which go2, as the Certifying Partner, is responsible, go2 will respond as per the Standards and Guidelines in order to preserve the credibility of the COR program.

## **Roles and Responsibilities**

### **go2:**

- Manage the quality assurance program
- Design and update the auditor training program
- Liaise with both auditors and auditees (employers)
- Resolve conflict relating to the audit program
- Liaise with industry and WorkSafeBC regarding related industry issues
- Review audits
- Monitor corrective actions / preventative actions during maintenance audit years
- Maintain a current database on COR status
- Ensure control and security of audit documents

### **WorkSafeBC:**

- Provide assistance and guidance to go2 on the development and implementation of the quality assurance program
- Approve and oversee go2's quality assurance program
- Audit the go2 quality assurance program

### **Employers:**

- Ensure conflicts of interest are avoided
- Ensure that audits are planned and scheduled
- Specify which areas are audited for COR certification
- Foster a positive audit environment by assisting and cooperating with the auditor so that audit objectives are met
- Provide access to facilities and supporting information as requested by the auditor
- Provide go2 with feedback on the audit process to assist with continuous improvement

## **Auditor Training and Certification**

### **COR External Auditor Training Prerequisites**

- Minimum 3 years of experience managing and/or auditing management systems
- OH&S experience and/or training; CRSP or CHSC designation an asset
- Hospitality / Tourism experience preferred
- Equivalent combinations of experience, training, and formal education
- Professional references from previously audited clients

### **Auditor Training Program Standards**

Minimum standards for auditor training require participants to:

- Attain a minimum of 80% in external auditor training (theory, practices, and exams) and attain a minimum of 50% in each of the training requirements (online exam, final exam, student audit, client evaluation)
- Deemed qualified by the auditor training instructor
- Successful completion of a student audit within 6 months of training

### **Length of Training**

The course is five days in length with approximately 8 hours of online introductory material followed by four days classroom training. Each external auditor will be required to complete a student audit following the classroom training to become certified.

### **Maximum Per Diem Charges**

go2 has established a maximum per diem rate of \$500 that auditors may charge employers for audit services. This figure was established in consultation with the Occupational Health and Safety Steering Committee and by reviewing the estimated rebate for hospitality and tourism employers in British Columbia that achieve COR certification. This figure is based on an 8-hour work day for time on site and does not include time to meet with clients or time to complete the audit report. These may be billed on an hourly basis provided the time does not exceed the \$500 per diem limit (eg. \$500 / 8 hour day =

maximum \$62.50 hourly charge). Auditors may negotiate other expenses such as travel and accommodation with each client.

### **Maintaining Auditor Certification**

To maintain current certification, the auditor will:

- Submit an acceptable internal or external audit annually for review by go2.
- Abide by the go2 auditor Code of Ethics at all times.

### **Qualifications for Auditors (Internal)**

Minimum standards for internal auditor training require participants to:

- Attain a minimum of 80% in internal auditor training (theory, practices, and exams) and attain a minimum of 50% in each of the training requirements
- Deemed qualified by the auditor training instructor
- Full-time employee of company to be audited
- Sample documentation demonstrating the ability to write clear, concise business related communications

# Auditor Code of Ethics

## Overview

go2 is responsible for overseeing and maintaining the integrity of the external auditors program, which includes addressing issues around the requirements of professional responsibility. The go2 Auditor Code of Ethics is intended to promote an ethical and cooperative culture in the COR program among all auditors.

The standards set forth in this document provide basic principles in auditor conduct and are the standard that is expected of all auditors. The responsibilities that the auditor has during the audit process place high ethical demands on their conduct and business practices.

Auditors are to conduct themselves in a manner consistent with the promotion of cooperation and good relations between auditors and the section. The hospitality and tourism sectors' confidence and respect which the auditor may enjoy is largely the result of the cumulative accomplishments of the auditors and go2. It is therefore in the interest of all auditors that they deal with the membership of the BC hospitality and tourism sector in a fair and balanced approach.

go2's Auditor Code of Ethics is based on two components:

1. **Principles** that are relevant to the profession and the practice of auditing.
2. **Rules of Conduct** that describe expected behaviour of auditors. The rules are intended as an aid to interpreting the Principles into practical application and are intended to guide the ethical conduct of auditors.

The Code of Ethics, together with the go2 Quality Assurance manual, provides guidance to auditors certified under the Certificate of Recognition (COR) program.

## Applicability and Enforcement

This Code of Ethics is directed at internal, external, and student auditors, as well as all other individuals working on a COR company audit. Breaches of the Code of Ethics will be reviewed and administered according to go2's Auditor Infraction and Disciplinary process as presented in this document. Even though a particular

conduct is not mentioned in the Rules of Conduct it does not prevent it from being unacceptable or discreditable.

## **Principles**

### **Integrity**

The integrity of auditors established trust and provides the basis for reliance on their judgment. Integrity requires auditors to observe both the form and spirit of auditing standards. It also requires auditors to observe the principles of independence, objectivity, standards of professional conduct, and absolute honesty in their work.

Auditors shall:

- Follow high standards of honesty, fairness, integrity, and ethical conduct;
- Respect and act with dedication to the program goals and vision;
- Conduct business in an honest and fair manner, without actual or apparent conflict of interest;
- Advise go2 in writing with reasons, whenever the activities or conduct of an auditor appear to be in conflict with this Code of Ethics;
- Not be associated with any report, statement or representation known to be false or misleading;
- Respect the integrity of other auditors, recognizing their different experiences and areas of expertise;
- Comply with Workers Compensation Act and the Occupational Health and Safety Regulations, as well as all other applicable laws and regulations;
- Not represent themselves as employees or contractors for go2 at any time.

### **Objectivity**

Auditors must exhibit the highest level of professional objectivity in gathering, evaluating, and communicating information about the audit activities. They must make a balanced assessment of all the relevant circumstances and are not to be unduly influenced by their own interests or by others when forming judgments. It is essential that auditors are independent and impartial, not only in fact but also in appearance.

Auditors shall:

- Conduct the audit as instructed by the Audit Protocol without bias, prejudice, variance, or compromise;
- Remain free of any influence, interest, or relationship that impairs professional judgment, independence, or objectivity while providing auditing services.
- Auditors must not market their services at anytime during the audit process;
- Disclose any potential personal or perceived conflict of interest during initial contact or communication with a client. External auditors are not permitted to audit companies where they have an affiliation through family or have engaged in work with this company in the past 12 months, or received an economic benefit.
- Protect their independence and not accept any gifts or gratuities which could influence, compromise, or threaten the ability of the auditor to act and be seen to be acting independently.
- Maintain both the actual and perceived political neutrality in order to discharge their duties and responsibilities in an impartial way.

## **Confidentiality**

Auditors must respect the value and ownership of information they receive during an audit and do not disclose information to any third party, orally or in writing, without appropriate authority, and unless there is a legal or professional obligation to do so.

Auditors shall:

- Maintain the confidentiality of information received during the audit;
- Be prudent in the use of information acquired in the course of their work;
- Take all reasonable steps to protect the confidentiality of the audit results, data collected, and the anonymity of interviewees;
- Not use audit information for any personal gain, financial, or otherwise that would be contrary to the law, the audit process, or detrimental to go2;
- Not share, either for profit or otherwise, any COR company process or program materials to others developed by or for go2 without the written permission of go2.

## Competency

Auditors must apply the knowledge, skills, and experience needed in the performance of auditing services.

Auditors shall:

- Engage in those services only for which they have the necessary knowledge, skills, and experience and not assign or subcontract any obligation of the audit program;
- Be consistent and accurate in their evaluations of data obtained through documentation, interviews, and observation;
- Strive to be complete in their evaluations and avoid any omissions;
- Separate fact from opinion clearly and concisely in their evaluations. Support for auditor opinions must be derived from quantitative, measureable data;
- Serve the client in a conscientious, diligent, respectful, and efficient manner;
- Conduct themselves with the utmost of professionalism and without bias or prejudice at all times when conducting audits or communicating with clients and go2;
- Assist clients with any post audit questions, such as recommendations or explanations of results;
- Commit to honest, thorough and straightforward communication in the performance of audit activities;
- Continually seek to maintain and improve their proficiency, effectiveness, and quality of their skills;
- Willingly and openly share their collective knowledge and always be in the pursuit of the truth and enhancement of health and safety in the hospitality and tourism sectors;
- Uphold the excellence of the COR program and work to improve the audit process and program.

## Conduct of Auditors

Auditors are expected to act in a responsible and professional matter at all times during the audit process. A violation of this conduct will be cause for immediate suspension of the auditor's license to audit for go2, pending an internal review of the violation.

- Honoring confidentiality is the cornerstone of the auditing process. Communications about the audit to outside individuals is forbidden.
- Auditors will strive to achieve the highest quality and effectiveness in both the process and products of their professional work.
- Auditors will not violate the stipulations of the Code of Ethics.
- Auditors will not act discriminatorily in any way to any persons.
- Profanity of any kind at any time is unacceptable.
- Auditors will be professional in their conduct and speech with all involved in the audit, including employees, contractors, and the staff at go2.
- Auditors are to dress appropriately for the conditions encountered during the auditing process and to be professional in appearance. Clothing with holes, rips, tears, or clothing displaying pictures or sayings that may be taken as offensive are not acceptable.

All sanctions against an auditor will involve a full investigation before any actions are taken. go2 is not required to apply progressive discipline in situations which are serious in nature and warrant severe penalties up to and including permanent removal of certification. Sanctions may include a combination of discipline, such as suspension as well as a requirement to be retrained in the program.

As part of the Code of Ethics, auditors will cooperate fully with an inquiry in the event of a breach of this Code of Ethics.

The fact that a particular conduct is not mentioned in this document does not prevent an action from being unacceptable, and therefore, an auditor or institution can be liable for disciplinary action.

## **Auditor Infraction and Disciplinary Process**

The Code of Ethics is the accepted practices that surround the auditor during the audit process. Violations of these are considered to be serious in nature, and will result in swift intervention by go2. In particular, the following sanctions may be administered to the auditor for violations of the Code depending on the situation:

1. Formal letter advising the auditor of the violation, a restatement of the required standard, and a stipulation to not have this reoccur
2. A requirement to have retraining undertaken by the auditor
3. Suspension of the auditor's certification
4. Permanent removal of the auditor's certification

## **Incomplete Audit Submission**

go2 will attempt to contact the auditor when an incomplete audit has been submitted. go2 can change an audit score if there are addition errors; however, a copy of the highlighted changes must be sent to the auditor for review. All other issues affecting the overall score cannot be changed without attempting to contact the auditor for discussion and agreement on proposed changes. The role of go2 is to provide guidance on audit protocol. Significant deviations to the audit protocol identified may result in audit rejection and/or auditor interview, which may result in retraining.

## **Quality of Comments / Recommendations**

Auditors must perform a review of audit recommendations to ensure they follow 'SMART' Principles:

- Simple – Not designed or stated with such complexity as to be difficult to understand or complete. There must be a clearly defined outcome with assigned ownership and timelines.
- Measurable – Actions and/or changes must be measurable so the company can overtly tell that the change is working as intended
- Attainable – Setting a standard that is high, but not unreachable by the company.
- Realistic – A recommendation must be practical in scope, so that the company can make it fit into their business unit.
- Timely – Something that can be implemented in a relatively short time frame (if possible) and a specific timeframe is identified.

## **COR Program - Dispute Resolution Process**

In the event that there is a dispute brought forth by the employer regarding the results of the audit performed by the external auditor, the matter will be resolved through a consensual process. The employer must submit a written request for a review of the audit report identifying the specific element that is being contested. As the certifying partner, go2 will initially review the matter brought forth by the employer and ensure the report is free from clerical errors and the auditor has applied a consistent approach to the element in question.

If a discrepancy remains, the matter will be reviewed further by go2 representatives who may involve other parties as required (e.g. WorkSafeBC, OH&S Steering Committee members, legal counsel, etc.)

If the employer's complaint is validated by the sub-committee, points will be rewarded for the audit element (this does not necessarily ensure COR certification will be awarded as all elements of the audit must receive a minimum of 50%, with a total score of over 80% for the entire audit). The auditor that performed the audit will receive clarification on how to interpret the element in question in the future.

If the auditor's original decision is verified, the employer will be notified in writing with reasons for the decision and supplied instruction on how to meet the requirements of the element.



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## COR External Auditor Program - Client Evaluation Form

go2 is continuously looking at ways of improving the quality of the audits performed by our external auditors. Please complete this form to ensure the services we provide are of the highest possible standards.

On a scale of 0 (strongly disagree) to 10 (strongly agree), please indicate how the auditor performed during the audit process in the following areas:

- During the initial meeting, the auditor explained the objectives, timing, and audit process and solicited your questions and concerns.
- The auditor displayed an understanding of your company's mission / operations / procedures.
- The auditor was cooperative in attempting to minimize interruptions to your operational activities and schedules.
- The auditor demonstrated knowledge of industry-related issues.
- The auditor demonstrated courtesy, professionalism, and a constructive and positive approach in all dealings with staff.
- The management team was informed of the audit status, issues, and results in a timely manner.
- Management had the opportunity to provide explanations or responses to audit findings as they developed during the audit process.
- During the post-audit briefing, the findings were adequately discussed and all issues of fact were resolved.
- The final report was accurate and clearly communicated the results of the auditor's findings.
- The audit recommendations were constructive, relevant, and actionable.

If you marked any of the areas above as a 4 or lower, please take a moment to detail why in the area below.

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