

COS-1-06

GUIDANCE FOR DEVELOPING A SEMS AUDIT PLAN

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**SEMS AUDIT &
CERTIFICATIONS**



**GOOD PRACTICE
DEVELOPMENT**



**DATA COLLECTION,
ANALYSIS & REPORTING**



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1. SCOPE / APPLICATION

This document provides guidance for planning Safety and Environmental Management Systems (SEMS) audits to the requirements of the relevant edition of American Petroleum Institute recommended Practice (API RP) 75 and applicable local regulations.

2. ACRONYMS

- **AB** - Accreditation Body
- **API** - American Petroleum Institute
- **ASP** - Audit Service Provider
- **ATL** - Audit Team Lead.
- **CAP** - Corrective Action Plan
- **COS** - Center for Offshore Safety
- **ISO** - International Organization for Standards
- **RP** - Recommended Practice
- **SEMS** - Safety and Environmental Management Systems

3. DEFINITIONS

- **Asset** - Equipment (individual items or integrated systems) and software used in offshore operations.
- **Audit Result** - Conformities, Deficiencies, Observations and Conclusions.
- **Audit Service Provider (ASP)** - Independent third-party organization accredited by COS to conduct SEMS audits.
- **Audit Team Lead (ATL)** - Qualified person who leads an audit team, who meets the requirements of Section 8.2 of COS-2-01, and is under the approval, support, and control of an Audit Service Provider when conducting an audit.
- **Auditee** - Company being audited.
- **Auditor** - Qualified person who is part of an audit team, who meets the requirements of Section 8.2 or Section 8.3 of COS-2-01, and is under the approval, support, and control of an Audit Service Provider when conducting an audit.
- **Component** - A policy, standard, practice, process, procedure, or control.

- **Corrective Action Plan (CAP)** - The written record of Corrections and Corrective Actions associated with identified deficiencies, as well as those already completed at the time of developing the CAP.
- **Effective** - The extent to which the management system or an element achieves the desired result as defined by the management system.
- **Established** - Management system or Component is in place and, if required by regulation or by the organization, documented.
- **Finding Level 1** - The Establishment, Implementation or Maintenance of a management system element is not conforming with requirements such that the Element cannot achieve its intended results. A Finding Level 1 requires Corrective Action(s) be included in a Corrective Action Plan.
- **Finding Level 2** - A Finding Level 2 meets one or both of the following criteria:
 - o An Element can achieve its intended results but the Establishment, Implementation or Maintenance of a Component(s) within the Element only partially conforms to the requirements for that Component and is indicative of a systemic issue.
 - o The functionality of an individual major incident prevention or mitigation control (as defined by the Auditee) is impaired.

A Finding Level 2 requires Corrective Action(s) be included in a Corrective Action Plan.

Note: Individual Observations within separate Elements may indicate a systemic issue that can result in a Finding Level 1 or 2.

- **Headquarters** - Company location that has overall management and control of its SEMS.
- **Implemented** - Management system or Component is put into effect or action.
- **Maintained** - Management system or Component continues to work as designed, is checked, and corrections or adjustments are made, if required.
- **Subject Audit Period** - The period of time of Auditee's operations that will be reviewed by the audit team. Normally, the Subject Audit Period will begin at the completion of the previous SEMS audit and end at the completion of the current SEMS Audit.

4. INTRODUCTION

The Center for Offshore Safety (COS) has developed guidance for what should be in a written plan for auditing a Safety and Environmental Management System (SEMS) in consideration of the applicable requirements of API RP 75 *Development of a Safety and Environmental Management Program for Offshore Operations and Facilities, 3rd Edition*, and COS-2-03 *Requirements for Third-Party SEMS Auditing, 2nd Edition*¹.

A written audit plan documenting the audit scope, timing, team make-up, and procedures for executing the audit and reporting the Audit Results, is intended to ensure the effective use of resources during the audit.

This guidance can be used for any SEMS audit, including an audit intended for certification under COS-2-05 *Requirements for COS SEMS Certificates*. When planning an audit, it is incumbent upon the Auditor and Auditee to agree on the approach and to consider expectations of stakeholders.

¹API RP 75 3rd edition and parts of COS-2-03 1st edition have both been incorporated by reference under 30 CFR 250.198.

5. GUIDANCE

COS provides the following guidance for the Auditee and the Audit Service Provider (ASP) when developing the audit plan. The guidance is intended to indicate what information should be included in each section of the audit plan. The ASP and the Auditee should agree on the plan and its format, and it should be distributed to relevant parties in advance and as required.

This guidance should be used to help document the planned activities to meet the requirements for an audit of a SEMS described in API RP 75, 3rd Edition, Section 12, and COS-2-03, 2nd Edition. Sections 5.1 – 5.11 below should be addressed in the audit plan.

5.1 AUDIT OBJECTIVES

The objectives of the audit should be described and include the following, along with an explanation of any exceptions:

- Verification that the SEMS includes all relevant sections of API RP 75;
- Verification that the SEMS elements are Established, Implemented, and Maintained;
- Verification that the SEMS elements incorporate the requirements;
- Verification that the Auditee evaluates the suitability, adequacy, and Effectiveness of the SEMS;
- Verification that the Corrective Actions in the Corrective Action Plan (CAP) from the previous SEMS Audit have been completed or are on schedule for completion.

5.2 AUDIT SCOPE

The audit scope should describe the extent and boundaries of the audit. It should include the name of the Auditee; the types of operations, work activities, and Assets to be audited, and the Subject Audit Period. Details of the operations, work activities, and assets should be identified elsewhere in the plan.

5.3 AUDIT CRITERIA

Audit criteria are the specific requirements for which Auditors seek confirmation. This section identifies those specific requirements and should include API RP 75 and Components of the Auditee’s SEMS. The audit plan should identify and provide a rationale for any SEMS Elements that are to be focused on or excluded from consideration. The ASP should document the SEMS element selection and/or exclusion process in the audit plan.

The audit criteria should be identified in this section or through other methods (i.e. reference lists, attachments, etc.)

5.4 IDENTIFICATION OF THE AUDIT TEAM

The audit team consists of an Audit Team Lead (ATL) and Auditors. The audit plan should include information that demonstrates that the ATL and Auditors meet the requirements for Audit Team Leads and Auditors in COS-2-01 and COS-2-02. This information may be included in this section or in attached Curriculum Vitae, reference lists, attachments, etc.

The audit plan should include information regarding the ATL’s certification (i.e. certification type, certificate number, and third-party Auditor certification body²). The names and affiliations of all members of the audit team should be included in the plan. A table may be included to detail the make-up of the audit team.

AUDITOR NAME	TEAM ROLE	AFFILIATION	BRIEF DESCRIPTION OF QUALIFICATIONS*
[INSERT TEAM LEADER NAME]	AUDIT TEAM LEAD	ASP	(INCLUDE CERTIFICATION TYPE AND NUMBER AND THIRD-PARTY CERTIFICATION BODY)
[INSERT TEAM MEMBER NAME]	TEAM MEMBER	ASP OR COMPANY	
[INSERT TEAM MEMBER NAME]	TEAM MEMBER	ASP OR COMPANY	

*COS-2-01 requires the ASP to verify the qualifications of Audit Team Leads and Auditors.

²See paragraph 8.2.1 of COS-2-01.

5.5 IDENTIFICATION OF THE ASSETS TO BE AUDITED

The audit plan should list the Assets to be audited, with estimated dates each asset may be audited. The proposed list of assets may be modified in the course of the audit. It is recommended that the Auditee maintain a list of Assets to support the selection of the audit sample. This list does not need to be included in the plan.

A representative sample of at least fifteen percent (15%) of the Assets operated should be audited, with a minimum of one facility representing each type of operation. The selected Assets should not be the same as those included in the previous audit, unless dictated by risk, history of incidents, limited number of Assets, results of last audit, or other consequential factors. Exceptions should be described in the audit plan.

Tables may be included to detail the breakdown of Asset representation for the audit and the estimated start dates. These tables can include:

- Type of operations underway on the Asset or the operation(s) that describe the Asset's function, for example: construction, production, wells, marine, aviation, accommodations, decommissioning
- Total number of Assets
- Number and percentage of Assets to be audited
- Asset name
- Asset description (fixed platform, offshore supply vessel, mobile offshore drilling unit, cementing unit)
- Scheduled audit date(s)

ASSET TYPE	ASSET OPERATION(S)	NUMBER OF ASSETS	NUMBER & PERCENTAGE OF ASSETS TO BE AUDITED

ASSET NAME	ASSET DESCRIPTION	SCHEDULED AUDIT DATE(S)

5.6 AUDIT SCHEDULE

The audit schedule should be described in the plan. The audit schedule is dependent on a number of factors, including:

- Audit objectives and scope (see sections 5.1 and 5.2)
- Team composition (see section 5.4)
- Number and type of Assets to be audited (see section 5.5)

The following factors also impact the audit schedule:

- Audit duration
- Time needed for audit preparation, execution, and reporting
- ASP/Auditor orientation of Auditee's organizational and SEMS structure and language
- Environmental conditions
- Operational activities
- Logistics
- Availability of personnel, both Auditee and Auditor

The ASP should use its documented process for determining the audit duration. While the basis for determining the audit duration should be documented and retained by the ASP, only the audit schedule itself needs to be included in the audit plan³.

Consideration should also be given to the inclusion of ASP orientation with the Auditee's management system. This should include agreement on access to records and documentation and specific Auditee terminology.

Environmental, operational, and logistical considerations can also impact the schedule (e.g., due to weather, site emergencies, additional data gathering, method of travel).

A detailed understanding of the audit activities for each Asset should be used to determine the personnel needed to fulfill the audit objectives. The schedule should be designed considering the availability of the identified personnel.

³See sections 6.1.3 and 6.1.4 in COS-2-03.

5.7 AUDIT PROCEDURES

The audit plan should include a description of how the audit will be conducted, how information will be collected and analyzed, and what terminology and definitions will be used. The audit activities should include observing work activities and tasks, reviewing records and documents, interviewing personnel, and periodic status discussions.

For unmanned Assets, the plan should describe how personnel responsible for the Assets will be interviewed, as well as persons that visit and work on the Asset. Sampling may be allowed in which some unmanned Assets are visited by the Auditors and other similar Assets are reviewed remotely and electronically. In this case, the sampling procedures should be described, especially with respect to representativeness of the sample.

5.8 CONFIDENTIALITY REQUIREMENTS

Confidentiality requirements should be described in the audit plan and should be consistent with Section 5 of COS-2-01 *Qualifications and Competence Requirements for Audit Teams and Auditors Performing Third-party SEMS Audits*, Section 4 of COS-2-03 *Requirements for Third-party SEMS Auditing*, and Section 5 of COS-2-04 *Requirements for Accreditation of Audit Service Providers Performing SEMS Audits and Certification*, as well as any additional requirements agreed upon between the ASP and the Auditee.

5.9 REPORT CONTENTS AND FORMAT, ISSUANCE, AND DISTRIBUTION

The audit plan defines the methodology for reporting the results of the SEMS audit. COS-1-08 *SEMS Audit Report Format & Guidance* is available and has been developed in consideration of applicable API and COS documents.

Prior to the commencement of the audit, the ASP and the Auditee should determine the start and completion date of the audit, the audit report distribution list, and the schedule for audit report development, review, and completion.

5.10 ADDITIONAL AUDITEE-SPECIFIC CONSIDERATIONS

Auditee-specific considerations that could potentially impact the safe and effective execution of the audit, such as logistics, safety requirements, and diversity of language, should also be addressed in the audit plan. Additionally, specific training and offshore travel requirements for the audit team should be addressed, e.g. Transportation Worker Identification Credential, Helicopter Underwater Egress Training, potential H₂S exposure and management.

5.11 CHANGES TO THE AUDIT PLAN

As part of the audit planning process, the mechanism for agreeing on and documenting changes to the audit plan should be described.

