



CSAM

**CONSTRUCTION SAFETY
ASSOCIATION OF MANITOBA**

Quality Assurance Program for Health and Safety Audits

Creation Date: 2003.11.25

Revision Dates: 2006.09.07
2008.06.09
2009.03.01
2010.08.10
2011.06.11
2015.06.05
2016.02.10
2021.02.04



Table of Contents

Quality Assurance Program Policy for Health and Safety Audits.....	4
Roles and Responsibilities.....	5
CSAM	5
CSAM Members and Association Members	5
Section 1: Program Objectives.....	6
Section 2: Auditing Standards.....	6
2.1 Mandatory Training Requirements.....	6
2.2 Eligible Employers	7
2.3 Safety & Health Program Review.....	7
2.4 Audit Instrument.....	7
2.5 Audit Request.....	7
2.6 Final Audit Review for Certification	8
2.7 Failure to Attain Minimum Audit Standards.....	8
2.8 Audit Costs	9
2.9 Registered Auditors.....	9
2.10 Team Audits	14
2.11 Audit Sampling – Interviews	14
2.12 Audit Sampling – Worksites	15
2.13 Out-of-Province COR™ Reciprocity.....	15
2.14 Audit Submission.....	15
2.15 Confidentiality.....	16
2.16 Certification Length.....	16
2.17 Site Assessment	16
2.18 Employer Non-Conformance	17
2.19 System Complaints/Appeals	17

Disclaimer

As an authority having jurisdiction to grant COR™ Certification in the province of Manitoba through the Canadian Federation of Construction Safety Associations (CFCSA), the Construction Safety Association of Manitoba (CSAM) will utilize this Quality Assurance Program for Health and Safety Audits as our ongoing process of quality assurance of our COR™ and SECOR™ programs.

Employers are responsible for the effectiveness of their own programs, policies and systems; as well as the adherence to the guidelines stated herein.

Users of the Quality Assurance Program for Health and Safety Audits are responsible to ensure adherence to the most current version.

Quality Assurance Program Policy for Health and Safety Audits

The Construction Safety Association of Manitoba (CSAM) is dedicated to providing our members with quality services throughout the province. CSAM will strive to work in the best interests of Manitoba construction related companies to provide them with effective tools to create and maintain a positive safety culture.

COR™ is an occupational health and safety accreditation program that verifies a fully implemented safety and health program which meets national standards. The objectives of COR™ are to provide industry employers with an effective safety and health management system to reduce incidents, accidents, and injuries as well as their associated human and financial costs. COR™ is now frequently used as a pre-qualifying and/or condition of contract by public and private project owners across Canada.

Designed to assist companies in the development and maintenance of a company-wide safety program, the COR™ Certification is the highest distinction available in the industry. It is nationally recognized as the ultimate distinction for construction companies.

The Construction Safety Association of Manitoba is the Authority Having Jurisdiction to grant COR™ Certification in the province of Manitoba for the building construction industry and associated members. In achieving this national safety program accreditation in Manitoba, CSAM practices the upmost diligence to ensure that the COR™ standards are upheld.

As a commitment to maintaining the safety & health excellence achieved through COR™ Certification, CSAM has established Audit Guidelines designed to monitor the quality of auditor training, compliance with audit protocol and a system for corrective action and follow-up.

COR™ audit standards and protocols are established by CSAM. The audit standards are approved and revised periodically by CSAM and the CSAM Advisory Committee. Amendments are communicated to member companies on our website, during our semi-annual COR™ Certified companies' meetings and/or through monthly newsletters. Continuous feedback is encouraged to maintain a program that is in line with industry objectives.

The Construction Safety Association of Manitoba expects employers and employees at all levels to take an active role in the maintenance of their COR™ Certification and Program Guideline. Through this team approach to quality management, we all can make positive contributions to reduce injuries and property damage in the construction industry.



Sean Scott
CSAM Executive Director

February 04, 2021
Date

Roles and Responsibilities

CSAM

The roles and responsibilities of CSAM include:

- CSAM is the authority having jurisdiction to grant COR™ Certification in the province of Manitoba
- Adhere to and verify the national standards of the CFCSA COR™ program are met when granting COR™ Certification in the province of Manitoba
- Design and maintain the required training programs as required by the national standards of the CFCSA COR™ program
- Manage the COR™ Quality Assurance Program for Manitoba
- Liaise with auditors and employers being audited
- Conflict resolution relating to the audit program
- Liaise with industry, Manitoba Labour, Manitoba Workplace Safety and Health, and the Manitoba Worker's Compensation Board regarding related industry issues
- Review and approve all audits submitted for the COR™ and SECOR™ audit process
- Maintain a current database on COR™ and SECOR™ status
- Control the security and confidentiality of audit documents

CSAM Members and Association Members

The roles and responsibilities of CSAM members and associates include:

- Ensuring conflicts of interest are avoided
- Ensuring audits are properly planned, scheduled and completed
- Ensuring all standards and protocol are followed for COR™ and SECOR™ Certification
- Fostering a positive audit environment by assisting and co-operating with the auditor so that audit objectives can be met
- Providing access to facilities and supporting information as requested by the auditor
- Actively participating in the audit process and maintaining a full-time employee(s) on staff who has completed the required COR™ training courses
- Developing and implementing corrective action plans
- Providing CSAM with feedback on the audit process to assist with continuous improvement
- Notifying CSAM of any changes to the organizations registered information
- Proper use of the COR™/ SECOR™ logo and trademark

Section 1: Program Objectives

The Quality Assurance Program for Health and Safety Audits is designed to ensure audits are performed in accordance with CSAM auditing protocol and that COR™/ SECOR™ Certified companies maintain their safety program in accordance with the CSAM COR™/ SECOR™ auditing standards.

Scope

COR™ Certification is achieved through the successful completion of three steps: completion of required training, implementation of your safety and health program, and verification by CSAM that the national COR™ standards are met. COR™ Certification is valid for a period not exceeding three years and must be validated annually with a letter of good standing that verifies the training elements and auditing standards are maintained.

The Quality Assurance Program for Health and Safety Audits applies to the initial year of achieving COR™ Certification and subsequent annual validation of all industry members, associate members, CSAM external auditors, CSAM Registered Auditors, CSAM staff and any person actively involved in the CSAM COR™/ SECOR™ program.

Section 2: Auditing Standards

2.1 Mandatory Training Requirements

2.1.1 COR™ Program

There are four required training modules which must be completed by an employee (or employees) of your company. These training modules provide your company with the information, resources, and ability to implement a safety and health management system (ie: safety program):

- Principles of Safety Management
**This course is mandatory for company owner and/or the most senior company representatives.*
- Safety Auditor Training
- Leadership for Safety Excellence
- Train the Trainer

2.1.2 SECOR™ Program

There are three required training modules which must be completed by an employee (or employees) of your company. These training modules provide your company with the information, resources, and ability to implement a safety and health management system (ie: safety program):

- Principles of Safety Management
**This course is mandatory for company owner and/or the most senior company representatives.*
- Safety Auditor Training
- Train the Trainer

It is the responsibility of the company to ensure that at least one full-time employee has the required training. Anyone employed by the company may take the courses. The same employee does not have to take all of the required courses. Any lapses in training requirements must be addressed prior to audit. Training courses do not expire.

2.2 Eligible Employers

To obtain a Certificate of Recognition, each Workers' Compensation Board Account (Firm number) held by an employer must independently achieve its own COR™/ SECOR™ certification.

All construction contractors who pay into the 400 Group of the Workers Compensation Board of Manitoba (except for the 407 and 408 sub-groups) are automatically members of CSAM. They are eligible to receive services and are entitled to pursue the issuance of a COR™/ SECOR™ certification through CSAM. An employer that falls outside the 400 group industry classification may choose to become an associate member and will therefore be entitled to pursue a COR™/SECOR™ through CSAM.

*NOTE: In 2020, the WCB identified several rate classifications as “naturally aligned” to CSAM. This refers to employers who do not pay the five per cent levy** to belong to an Industry Based Safety Program, but based on their business operations, would be best aligned with and served by the CSAM.*

The WCB rate classifications identified as naturally aligned to CSAM include:

- 31105 Fabricating Signs
- 50304 Cable and Satellite TV Distribution
- 50311 Audio Visual Services
- 50504 Telecommunications
- 60903 Concrete Supply
- 70302 Architects and Engineers
- 70604 Window Cleaning
- 70605 Yard Maintenance and Pest Control

2.3 Safety & Health Program Review

When requested, CSAM will review an employer's Safety & Health Program for content in relation to the COR™ national standards and CSAM's COR™ / SECOR™ audit instrument. A written report and feedback detailing areas for improvement will be provided with each safety program review.

2.4 Audit Instrument

The CSAM COR™ & SECOR™ Audit Instrument is designed for the Manitoba building construction industry and Associate Members. This audit instrument is designed to comply with the national standards as established by the Canadian Federation of Construction Safety Associations. CSAM will post the authorized COR™ & SECOR™ Audit Instrument on its website.

NOTE: A successful audit must achieve a minimum score of 80% overall, and a minimum of 50% in each element

2.5 Audit Request

The employer must contact CSAM when ready to proceed with a CSAM internal audit. The employer must have representative active work sites for the audit to proceed. At least one (1) active work site and 50% of peak workforce must be available at the time of the audit. It is the sole responsibility of the employer to schedule the audit during active work periods.

2.5.1 CSAM Certification Audit (Year 1) The employer must:

- Maintain at least one employee with the required training
- Implement/establish a safety and health program that contains all fourteen elements as outlined by CSAM
- Pass an internal self-audit conducted by the company
- Pass an internal audit conducted by CSAM
- Pass an external audit conducted by a CSAM appointed external auditor

2.5.2 CSAM Verification Audit (Year 2 & 3) The employer must:

- Maintain at least one employee with the required training.
- Submit a successful annual self-audit by a Registered Auditor prior to the anniversary date of their initial COR™ Certification.
- Pass an internal audit conducted by CSAM

2.5.3 CSAM Re-Certification Audit (Year 4) The employer must:

- Maintain at least one employee with the required training.
- Submit a successful annual self-audit by a Registered Auditor prior to the anniversary date of their initial COR™ Certification.
- Pass an internal audit conducted by CSAM
- Pass an external audit conducted by a CSAM appointed external auditor

It is the Employer's responsibility to ensure that a full and complete self-audit is submitted by a current or new Registered Auditor (see section 2.9) applicant.

2.6 Final Audit Review for Certification

When the external audit meets CSAM audit standards, CSAM will approve the audit and grant COR™ Certification and/or issue a Letter of Good standing to maintain their COR™ Certification.

2.7 Failure to Attain Minimum Audit Standards

COR™ Certification require adherence to the minimum audit standards as outlined by the CSAM COR™ and SECOR™ audit instrument. A successful audit must achieve a minimum score of 80% overall, and a minimum of 50% in each element. Failure to attain any of the minimum standards will result in either of the following:

- At the CSAM Executive Director's discretion, an employer will be given a reasonable time frame (not exceeding 2 weeks) to attain the minimum standards found lacking and resubmit; or
- At the CSAM Executive Director's discretion, an employer will be subject to a minimum two-month suspension of their COR™ Certification and must be re-audited (see section 2.8.1).

2.8 Audit Costs

Automatic Members:

Construction contractors who pay into the 400 Group of the Workers Compensation Board of Manitoba (except for the 407 and 408 sub-groups) are automatically members of CSAM.

The nominal fee of \$275.00 will be charged to the employer for an external audit and for CSAM COR™ Certification Audits (year 2 & 3). The remainder of the external audit expense will be absorbed by the CSAM.

Associate Members:

An employer that falls outside the 400 Group of Workers Compensation Board of Manitoba may choose to become an associate member. Construction contractors in the 407 and 408 subgroups must purchase an associate membership.

The nominal fee of \$275.00 will be charged to the employer for a CSAM qualifying audit and an additional \$550.00 for the external qualifying audit. For CSAM COR™ Certification Audits (year 2 & 3) the employer will be charged \$550.00 for the CSAM audit. The remainder of the external audit expense will be absorbed by CSAM.

Note: Distant and/or isolated worksites may also be charged mileage and/or accommodation expenses at the discretion of the Executive Director.

2.8.1 Re-Audit (minimum standard not met/achieved)

If a company does not meet the minimum standards of an external audit, or the CSAM Verification Audit (year 2 & 3), an additional service fee of \$550.00 will be charged for second or subsequent CSAM audits, and/or the company may be charged the full amount of the second or subsequent external audits.

2.9 Registered Auditors

A registered auditor is a recognized and specially trained individual who is qualified to assess an employer's health and safety management system. Individuals who apply for Registered Auditor status must complete CSAM's Principles of Safety Management and Safety Auditor Training courses. Equivalent training through other members of the Canadian Federation of Construction Safety Associations will be given credit at the discretion of CSAM.

Items Required for Registered Auditor Application Submission:

- Completion of the Application for Registered Auditor
- Verification of training (Principles of Safety Management & Safety Auditor Training)
 - Equivalent training through other members of the Canadian Federation of Construction Safety Associations will be given credit at the discretion of CSAM
- Submission of a completed audit instrument and required supporting documentation
- Submission of a corrective action plan including: corrective action, assignment of responsibility and implementation dates

A CSAM Registered Auditor Certificate with a 3-year expiry date will be issued upon successful evaluation and approval. Registered Auditors must submit one self-audit every 3 years to maintain their status.

2.9.1 Internal Registered Auditor

Internal Registered Auditors are permanent employees or consultants of the employer who have received instruction and training from CSAM or equivalent on how to conduct, document, and score an audit of health and safety management systems. The internal registered auditor is empowered to conduct both certification audits and annual verification audits.

2.9.1.1 Internal Registered Auditor Standards

An Internal Registered Auditor must demonstrate:

- Technical competence
- Evidence of some background in occupational health and safety risk management
- A familiarity with general occupational health and safety audit principles
- A proficiency in the application of audit data collection techniques
- A proficiency in the analysis and evaluation of occupational health and safety information

An Internal Registered Auditor is expected to:

- Ensure that concise, detailed, and relevant notes are maintained during the data collection process
- Conform to and be a role model in all occupational health and safety practices while on site
- Ensure that both positive observations and opportunities for improvement are reflected in the final report
- Undertake respectful, relevant, and engaging interviews with all client employees
- Have completed training required for the type of audit they will be performing
- Must commit to the Code of Ethics for Registered Auditors(see section 2.9.4)
- Must maintain a Registered Auditor Certificate
- Must conduct a minimum of one audit every 3 years.
 - CSAM will accept team audits from registered auditors to satisfy this requirement, provided the auditors are involved in all verification of the document review, interview, and observation processes and each auditor completes and signs their own audit corrective action plan. See Section 2.10 for more information.

2.9.2 External Registered Auditor

External Registered Auditors possess a high degree of expertise and competency in occupational health and safety auditing. An external registered auditor must have received instruction and training from the CSAM on how to conduct an audit of health and safety management systems unless the auditor candidate has been exempted from a portion of the training due to prior qualifications. An individual certified as an external registered auditor is empowered to conduct both certification audits and re-certification audits. Refer to the CSAM External Registered Auditor Guidelines for further details.

2.9.2.1 External Registered Auditor Standards

An External Registered Auditor must:

- Have recently completed (within the past 12 months) the Principles of Safety Management and Safety Auditor training courses.
- Have a good working knowledge of the construction industry.
- Possess technical competence.
- Provide evidence of some background in occupational health and safety risk management.
- Have a familiarity with general occupational health and safety audit principles
- Be proficient in the application of audit data collection techniques
- Be proficient in the analysis and evaluation of occupational health and safety information

An External Registered Auditor is expected to:

- Ensure that concise, detailed, and relevant notes are maintained during the data collection process
- Conform to and be a role model in all occupational health and safety practices while on site
- Ensure that both positive observations and opportunities for improvement are reflected in the final report
- Undertake respectful, relevant, and engaging interviews with all client employees
- Have completed training required for the type of audit they will be performing
- Must commit to the “Code of Ethics for Registered Auditors”
- Must maintain the quality and currency of their skill set and knowledge base.
- Must maintain a valid Registered Auditor Certificate.
- Must conduct a minimum of three (3) audits annually

CSAM may impose mandatory external auditor training, refresher courses or qualifications as required.

2.9.3 External Registered Auditor Representation

External Auditors must abide by CSAM established audit protocol and work in sole representation of CSAM. Reference to other companies or their related information is prohibited and is deemed to be a breach of confidential information.

2.9.4 Code of Ethics for Registered Auditors

All auditors must strive to maintain a high level of professional conduct at all times. To ensure that quality audits are consistently performed, auditors must abide by the following:

- **Confidentiality:** Auditors must ensure that all information obtained through the audit process is treated as confidential. Information must not be disclosed to parties other than the employer and CSAM, except where the auditor is authorized or otherwise legally obligated to disclose the information. Auditors must always maintain the confidentiality of the interview process.
- **Professional Conduct:** Auditors shall behave in such a manner that their good faith and integrity will not be questioned..

- **Diligence:** Auditors are expected to act in good faith, to be responsible, to act with due care and competence, and not to misrepresent material facts or allow their independent judgement to be compromised.
- **Accuracy:** Auditors must be accurate and consistent in their evaluations of data obtained through documentation, interviews, and observation.
- **Completeness:** Auditors must ensure their evaluations are complete and must avoid any omissions relevant to the scope of the audit.
- **Clarity:** Auditors must ensure their suggestions for improvement and other notes and observations are clear, concise, reflective of the audit findings, and written in plain language.
- **Honesty:** Auditors must be honest in their assessment of the employer's workplace health and safety management system and in their dealings with all persons involved in the audit.
- **Objectivity:** Auditors must separate facts from opinion and must not allow personal feelings or prejudices to affect their evaluation. Evaluations must be based on objective and measurable data, instead of subjective opinions or auditor assumptions.
- **Relevance:** Auditors must ensure their recommendations are relevant to the employer's operations, that they meet the standards of the audit instrument, and that they add value to improving the employer's health and safety management system.
- **Timelines:** Auditors must ensure that audits comply with all required timelines for audit completion, submission, and corrections.
- **Corporate Opportunity:** Auditors are prohibited from using either the employer's or the CSAM's intellectual property or information for personal gain (including for the gain of family members or friends).
- **Duty to Report:** Auditors must report situations where another auditor may have violated the Code of Ethics or engaged in unethical audit practices to CSAM immediately
- **Compliance with CSAM Audit Protocol:** Auditors must follow all auditing and quality assurance standards as established by CSAM.
- **Compliance with Legislation:** Auditors must comply with all applicable laws, rules, regulations of federal, provincial, and local governments, and appropriate private and public regulatory agencies.

Auditor participants are required to sign the Code of Ethics when attending the CSAM Auditor Training Course (one-day and re- certification).

Auditors must acknowledge that if they are suspended for a period of twelve months or more through the disciplinary process, their employer will be notified.

2.9.5 Registered Auditor – Failure to Maintain Audit Standards

Audits submitted by a Registered Auditor or applicant require adherence to the standards as outlined by CSAM and the CSAM audit instrument. Audits submitted by a Registered Auditor or applicant that do not comply with the standards will result in one of the following actions at the discretion of the CSAM Executive Director:

- A Registered Auditor will be required to meet with CSAM to review the Registered Auditor Checklist report. It may be recommended they retake the Safety Auditor Training course prior to their next audit submission.

- Registered Auditor status will be suspended from submitting an audit for 6 months or greater at the discretion of CSAM based on previous reports and/ or corrective action not taken by the Registered Auditor.
- Registered Auditor status will be suspended from submitting an audit for 13 months or greater at the discretion of CSAM based on previous reports and/ or corrective action not taken by the Registered Auditor.

2.9.6 Auditor Non-Conformance

2.9.6.1 Conflicts of Interest for External Registered Auditors

The following criteria must be specified for audits conducted:

- The auditor has not helped to build, establish, implement, advise, consult, or maintain the employer's health and safety processes at any time during the twelve-month period preceding the audit.
- The auditor must not have been employed by or been in a direct contractual relationship with the employer within the twelve-month period preceding the audit. Exceptions include:
 - delivering generic training courses
 - providing other services not directly evaluated by the audit instrument (e.g. Audiometric testing).
- The auditor should not have a personal relationship (e.g. family members, closer personal friends) with any key employees or members of the management group at the operation being audited where that relationship may be perceived to influence the results of the audit.
- The auditor must not make audit recommendations with the intent to market or to justify the purchase of additional business services from either the auditor or a member of the auditor's corporate group or family.

CSAM will verify that all audits conducted by External Auditors are free from potential conflicts of interest.

2.9.6.2 Breach of Auditor Code of Ethics/Conflicts of Interest

CSAM may become aware of an actual or potential breach of the Registered Auditor Code of Ethics through our own investigation, or from information received from an auditor, employer or other individual. All concerns from outside parties must be submitted in a written format. CSAM reserves the ability to investigate any or all anonymous concerns from outside parties whether received verbally or in writing.

In the event a complaint is received with respect to an external auditor, or if CSAM receives a complaint of auditor misrepresentation, CSAM will conduct a documented review into the matter and consider all the available facts and concerns of the affected parties. This information will remain on the auditor's file. The review may result in disciplinary action at the discretion of the Executive Director which may include suspension of the External Auditor's Registered Auditor status for a period of 13 months.

CSAM reserves the right to deny the submission of any audit for violation of any conflict of interest and/or in the opinion of the CSAM Executive Director. Denial of an audit or breach of these items will forfeit the external auditor fees and shall place him/her on suspension for a minimum of six months.

2.9.6.3 Appeal Process

An appeal may be launched by the suspended auditor in writing and forwarded to the attention of the Executive Director of CSAM.

2.9.7 Registered Auditor Performance Management

CSAM will contact the auditor in the event that an audit is received that does not meet the quality assurance requirements. CSAM will not change an audit score without attempting to contact the auditor for discussion and agreement on proposed changes. If agreement on the proposed changes cannot be achieved, CSAM will reserve the right to take disciplinary action against the auditor, which may include suspension of their Registered Auditor certificate for a period of up to 13 months.

2.10 Team Audits

Audits conducted for certification or maintenance may be conducted by two or more auditors working together as a team. All members of an audit team conducting these audits must be registered auditors or applicants. Each auditor is responsible for:

- Audit results
- Quality of the corrective action plan
- Executive Summary sign off

2.11 Audit Sampling – Interviews

All health and safety audits completed for certification or verification of certifications must be completed using the same basic auditing principles and standards to ensure the integrity of the audit process and the credibility of audit results.

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 personnel from:

- All departments
- All shifts
- All employee levels (workers, supervisors, managers)
- All levels of experience (new hires, many years of experience)
- All types of work
- A representative number of work sites

2.12 Audit Sampling – Worksites

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, at a minimum, consider the following criteria:

- All activities under applicable WCB accounts and industry codes
- Work site size differences
- The type of conditions from one work site to another
- The location of the work sites
- The industry codes covered by this audit

2.13 Out-of-Province COR™ Reciprocity

Employers that have attained an out-of-province COR™ Certification through a member of the CFCSA having jurisdiction to grant COR™ Certification and do not have a permanent office in Manitoba may apply for reciprocity. They will need to provide CSAM with:

- A letter requesting COR™ reciprocity in Manitoba
- Confirmation from your host construction safety association that your COR™ is current including a current letter of good standing and COR™ certificate
- Documentation to confirm adherence to the CSAM COR™ audit instrument – Manitoba Supplement (Section 14) and/or as required
- Compliance Declaration

Once the above material is received, reviewed, and approved by CSAM, a letter of reciprocity and a Manitoba COR™ Equivalency certificate shall be issued. This certificate may be valid for the same period of time of their original provincial COR™ certificate and subject to all Audit standards of CSAM. COR™ reciprocity shall not exceed one year.

NOTE: Expiry of employers out of province COR™ will result in the expiry of the related Manitoba COR™ Equivalency. Requests for extensions must be made in writing accompanied by the requirements outlined above. When a company has allowed their COR™ to expire, it will be the responsibility of the employer to re-apply.

If an out-of-province employer establishes a permanent office location in Manitoba during the COR™ reciprocity period, they are no longer considered to be an out-of- province employer. They are required to contact CSAM so that scope for their next external/internal audit can be established.

2.14 Audit Submission

After the completion of any audit, the auditor is responsible for submitting the original audit instrument and all supporting documentation. Audits must be submitted by a Registered Auditor or an individual applying for Registered Auditor status. Audits must include a corrective action plan which identifies corrective action, assigns responsibility, and establishes implementation dates.

Audits submitted must be organized by the prescribed audit instrument and include all supporting documentation. **A successful audit must achieve a minimum score of 80% overall, and a minimum of 50% in each element.**

NOTE: All supporting documentation submitted during the audit process will not be returned to the company and will remain on file at the CSAM head office.

CSAM staff will review any audits submitted using the Audit Submission Form to verify supporting documentation is organized in the appropriate format and includes a complete corrective action plan. Once approved, the company representative will receive a copy of the completed Audit Submission Form to confirm receipt of the audit submission.

2.15 Confidentiality

All audit reviews, audit instruments and supporting documentation are strictly confidential and will be kept on file with CSAM for a minimum of 1 year. These findings will not be released to anyone, except as outlined above or as legally required.

2.16 Certification Length

Certification is valid for a period not exceeding 3 years and must be validated annually with a Letter of Good standing. The annual letter of good standing verifies that required training elements and auditing standards are maintained.

The CSAM Executive Director reserves the right to temporarily suspend, revoke and/or limit the length of time that Certification is issued for. Furthermore, CSAM reserves the right to conduct site assessments and/or require a spot audit on Certified employers at any time to ensure that audit standards and program standards are consistently maintained.

When an employer has allowed their certification to expire, it is the responsibility of that employer to re-apply.

2.17 Site Assessment

CSAM reserves the right to conduct site assessments and/or require a spot audit on Certified employers at any time to ensure that audit standards and program standards are maintained. A site assessment will be conducted within 3 months of a company becoming newly certified.

CSAM site assessments require adherence to the minimum standards as outlined by CSAM and the CSAM Site Assessment Form.

Upon completion of the CSAM Site Assessment, a formal letter detailing one of the following three options will be sent to the Certified company:

- **No follow-up required:** site and company have demonstrated leadership in providing an excellent example of a Certified company
- **Corrective Action required:** site and/or company needs minor improvements in demonstrating the expected example of a Certified Company.
 - At the CSAM Executive Director's discretion, an employer will be given a reasonable time frame (not exceeding 1 week) to provide confirmation that the corrective action is completed.

- **Spot audit Required:** site and/or company require major improvements to demonstrate the expected example of a Certified company. A new and current audit will be required to be completed by the company.
 - At the CSAM Executive Director's discretion, an employer will be given a reasonable time frame (not exceeding 2 weeks) to submit a full and complete company self-audit for review and evaluation by CSAM.
 - Results of CSAM's evaluation will be dealt with as a year 2 & 3 maintenance audit. If minimum standards are not verified, certification will be suspended and/or revoked as per section.
 - An additional service fee of \$500.00 will be charged for second or subsequent CSAM audits, and/or the employer will be charged the full amount of the second or subsequent external audits.

2.18 Employer Non-Conformance

If at any time an employer has been found to be non-compliant with Certification standards, CSAM reserves the right to review, suspend or revoke an employer's Certification standing. This may include:

- A spot Audit and/or Re-Audit
- A suspension of Certification
- Removal/revocation of an existing Certification

It is the responsibility of CSAM to initiate this process. The employer is responsible for any expenses incurred.

2.19 System Complaints/Appeals

2.19.1 Complaints

All complaints must be filed within one month of the occurrence.

Complaints regarding the auditor, audit process, employer dissatisfaction, or non-conforming Certified employer must be directed to the CSAM Executive Director in writing.

Employers, employees, or the public may file complaints. These complaints will be verified by investigation. Complaints that are verified will be subject to actions as stated in section 2.7 and/or 2.18.

An appeal may be launched by the affected party, in writing, and forwarded to the attention of the CSAM Executive Director.

2.19.2 Audit Appeal

All Audit Appeals must be filed within 2 weeks of the formal notification of audit results.

An employer that appeals an audit evaluation must first address its concerns to the CSAM Executive Director by:

- Providing a written request to the CSAM Executive Director requesting an evaluation of the audit
- Providing written documentation supporting the reasons why the audit evaluation is being disputed and how in its opinion the employer believes that it is complying with the COR™ audit instrument and COR™ standards.

Approved audit appeals will initially be reviewed by a CSAM staff member not originally involved in the audit process of the employer.

If warranted, a final review shall be conducted by an employer representative(s) of the CSAM Advisory Committee.

Recommendations of the review(s) shall be provided to the CSAM Executive Director who will provide a written response to the employer informing them of CSAM's findings.