



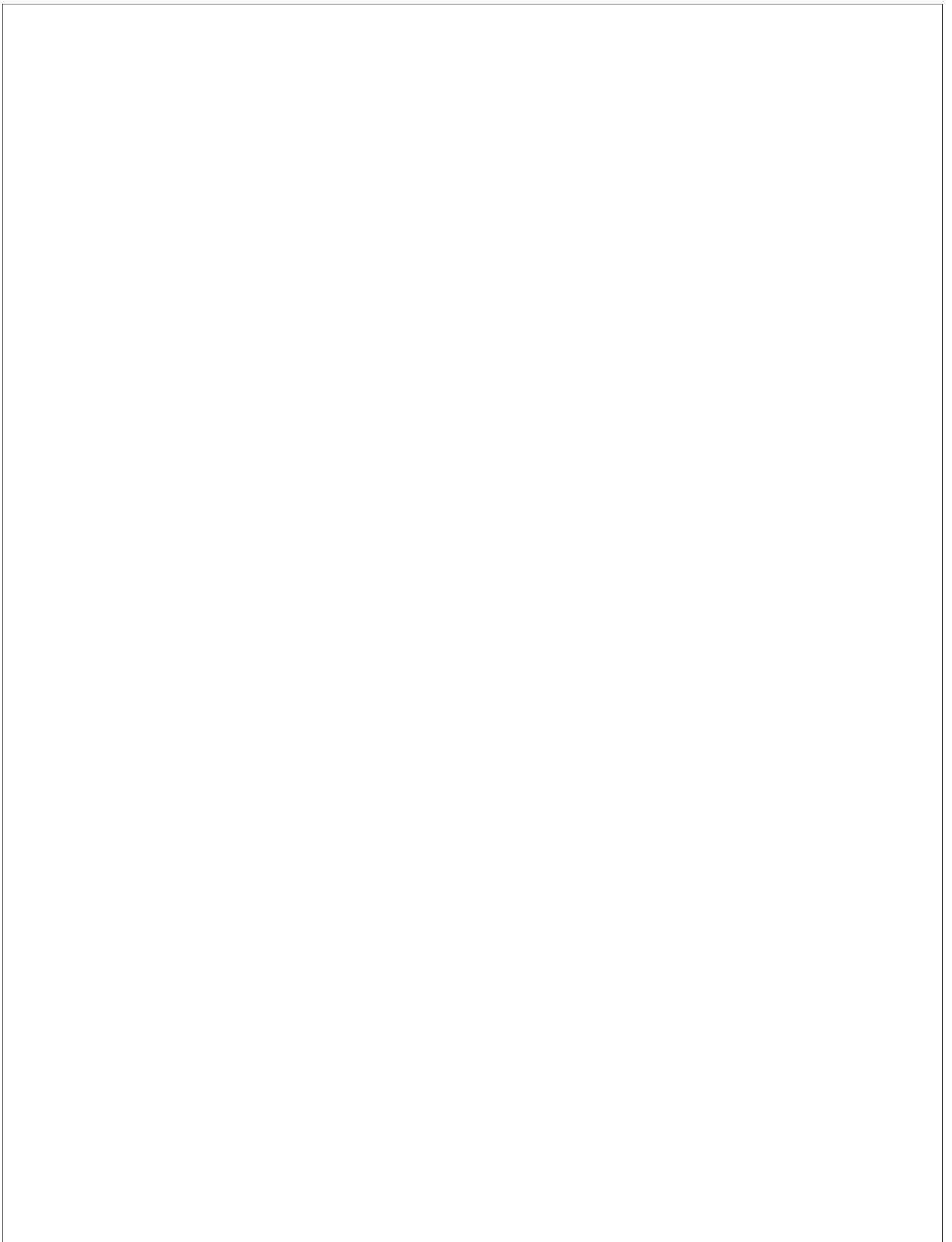
# **Qualification and Competence Requirements for Audit Teams and Auditors Performing Third-party SEMS Audits of Deepwater Operations**

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## FOREWORD

In an effort to achieve excellence in safety performance of its deepwater operations, the oil and gas industry created the Center for Offshore Safety (COS) with the mission to “promote the highest level of safety for offshore drilling, completions, and operations through effective leadership, communication, teamwork, utilization of disciplined management systems and independent third-party auditing and certification”.

To support its mission, the COS has developed a strategy for promoting safety and protection of the environment. This strategy includes third-party auditing and certification of COS member companies’ safety and environmental management systems (SEMS) and accreditation of organizations (Audit Service Providers) providing audit services. The third-party audits are performed to assist COS member companies in implementing and maintaining a safety and environmental management system (SEMS) throughout their deepwater operations.

While international standards for conformity assessments (including third-party audits) exist, these are generic and applicable to any industry or organization. Therefore, the requirements in this document supplement these standards and define those specific to the COS audit program. They were developed to assist in providing credible and consistent third-party audits to API RP 75 and 30 CFR Part 250, Subpart S.

As used in this document, the term “good practice” is defined as a SEMS-related practice that has been identified by the audit service provider, the COS member company, and COS as being exemplary and one that could potentially benefit others in the industry by being shared. There may be many recognized good practices associated with a single SEMS-related element.

Requirements defined in this document may change from time to time if deemed necessary by the COS.

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## 1. Scope/Application

This document defines the qualification and competence requirements for audit teams, audit team leads and audit team members performing third-party SEMS (safety and environmental management system) audits to API RP 75 and 30 CFR Part 250, Subpart S for deepwater operations. These requirements are not intended for use outside U.S. Gulf of Mexico deepwater operations.

## 2. Acronyms

- 2.1 **ACB** – Auditor Certification Body
- 2.2 **API** – American Petroleum Institute
- 2.3 **ASP** – Audit Service Provider
- 2.4 **CFR** – Code of Federal Regulations
- 2.5 **COS** – Center for Offshore Safety
- 2.6 **HUET** – Helicopter Underwater Egress Training
- 2.7 **IEC** – International Electrotechnical Commission
- 2.8 **ISO** – International Organization for Standardization
- 2.9 **RP** – Recommended Practice
- 2.10 **SEMS** – Safety and Environmental Management System
- 2.11 **SME** – Subject Matter Expert
- 2.12 **TWIC<sup>®</sup>** – Transportation Worker Identification Credential

## 3. Definitions

- 3.1 **Auditor** – person with the demonstrated personal attributes and competence consistent with the requirements of COS-2-01, COS-2-02 and ISO 19011.
- 3.2 **Audit Service Provider (ASP)** – independent third-party organization contracted by a COS member company to audit and certify its SEMS to the requirements of API RP 75 and 30 CFR Part 250, Subpart S.
- 3.3 **Auditor Certification Body (ACB)** – a recognized third-party personnel certification body that qualifies and certifies management system auditors.

- 3.4 Competency Evaluator** – an individual assigned by the ASP to assess the competence, skills, knowledge and ability of an Audit Team Member to conduct audits in accordance with the audit process requirements.
- 3.5 Subject Matter Experts (SME)** – an individual who provides specific knowledge or expertise to the audit team.
- 3.6 Training Provider** – a third-party organization that provides training to Auditors and Audit Team Leads, in accordance with COS publications and requirements.

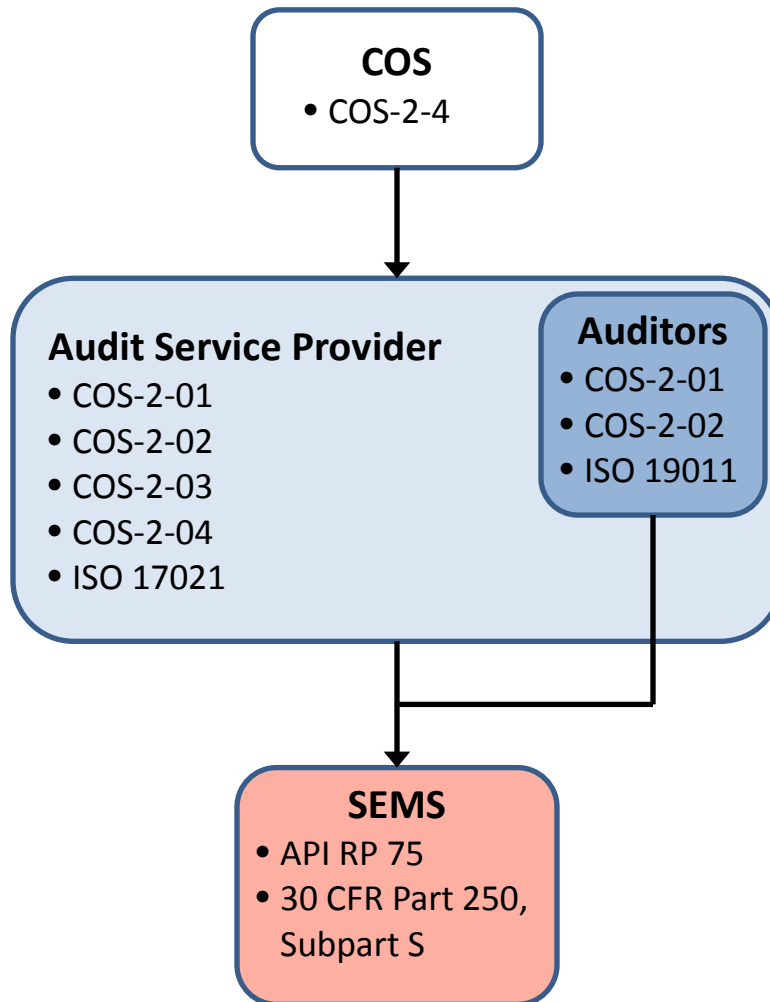
#### 4. References and General Information

**4.1** The following referenced documents, or parts of the referenced documents, constitute provisions of this document. The latest edition of the referenced document (including any amendments) applies.

- **ISO/IEC 17021: Conformity Assessments – Requirements for bodies providing audit and certification of management systems**
- **COS-1-01: COS SEMS RP 75 Audit Protocol**
- **COS-2-02: Training Program Requirements for Auditors and Audit Team Leads Performing Third-party SEMS Audits of Deepwater Operations**

**4.2** The following documents contain useful general information.

- **API RP 75: Recommended Practice for Development of a Safety and Environmental Management Program for Offshore Operations and Facilities**
- **COS-2-03: Requirements for Third-party SEMS Auditing and Certification of Deepwater Operations**
- **COS-2-04: Requirements for Accreditation of Audit Service Providers Performing SEMS Audits and Certification of Deepwater Operations**
- **ISO 19011: Guidelines auditing management systems**
- **30 CFR Part 250; Subpart S: Oil and Gas and Sulphur Operations in the Outer Continental Shelf-Safety and Environmental Management Systems**



**Figure 1 – Document Relationships**

## 5. Confidentiality of Information

The ASP shall ensure that auditors selected to conduct audits as part of the COS third-party audit and certification program are fully aware of the ASP's policies concerning confidentiality of client information and any additional confidentiality requirements agreed to between the ASP and the COS member company.

## 6. General Requirements

**6.1** The ASP shall identify and document the specific roles and responsibilities of the Audit Team Lead and Audit Team Members, including Subject Matter Experts.

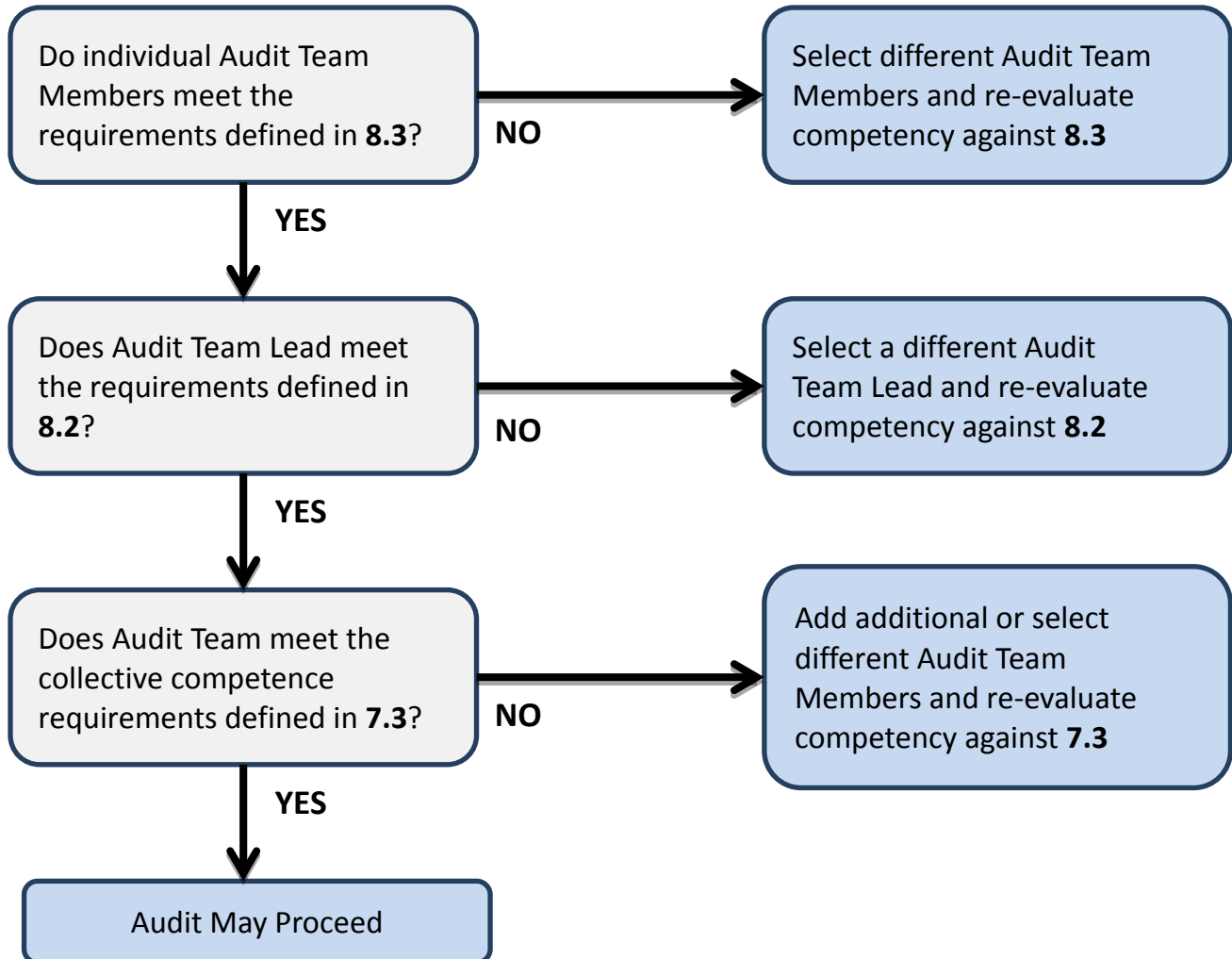
- 6.2** The ASP shall verify the qualifications of Audit Team Leads and Auditors, including Subject Matter Experts, as Audit Team Members or Subject Matter Experts, in accordance with a process that meets the requirements of COS-2-01, and the requirements of ISO 17021, Section 7 with exceptions as identified in 6.2.1 and 6.2.2.
- 6.2.1** Evaluators are allowed to qualify as audit team members. See 10.3 for additional information.
- 6.2.2** The requirement of ISO 17021, Section 7.2.4, for an “initial competence evaluation of an auditor” to be “determined by a competent evaluator observing the auditor conducting the audit” shall not apply.

## **7. Selecting Audit Teams**

- 7.1** The ASP shall select and appoint members of the audit team, including the Audit Team Lead, taking into account both the joint and individual competence needed to achieve the objectives of the audit. Refer to Figure 2, Decision Flow – Assuring Audit Team Competency, for additional guidance.
- 7.2** The audit team shall consist of a minimum of three auditors; one of the auditors shall be designated as the Audit Team Lead. The team may be supported by subject matter experts, if needed. The level of subject matter expertise shall be agreed upon between ASP and the COS member company in advance of the audit. See also 9.
- 7.3** The ASP process for selecting and appointing audit team members shall ensure audit teams collectively meet the following requirements:
- 7.3.1** Demonstrated knowledge, understanding, and at least five (5) years working experience in the implementation, maintenance, or auditing of safety and environmental management systems;
- 7.3.2** Demonstrated knowledge, understanding and at least five (5) years working experience, in offshore or related oil and gas operations, in each of the following areas: 1) management of change processes; 2) hazard and risk analysis; 3) the development and implementation of offshore facility operating procedures; and, 4) process safety;
- 7.3.3** Technical expertise in mechanical integrity, which includes at least five (5) years working experience with the processes, equipment and operations related to the facility being audited;
- 7.3.4** Specific knowledge and understanding of the application and use of the COS SEMS Audit Protocol (COS-1-01); and,



**7.3.5** Education and/or experience to comprehend and evaluate how the offshore activities, raw materials, production methods, and equipment, products, byproducts and business management systems may impact health, safety, and environmental performance on offshore facilities.



**Figure 2 – Decision Process Flow – Assuring Audit Team Competency**

**7.4** The ASP must ensure that audit team members have the required expertise in the areas of the audit for which they are responsible. The ASP must maintain records for a minimum period of six (6) years for each SEMS audit identifying and demonstrating which individuals in the audit team address the specific competency requirements in 7.3.

- 7.5** Each audit team shall have an Audit Team Lead with the qualifications and competencies identified in 8.2.
- 7.6** Each member of the audit team who will be going offshore shall have the safety and process related training and certifications required by the offshore facility(ies) being visited (e.g. HUET, Safegulf, TWIC®, etc.).
- 7.7** Audit teams may include Auditors and Audit Team Leads-in-training, provided that:
  - 7.7.1** The roles and responsibilities within the Audit Team of the Auditors and Audit Team Leads-in-training are clearly defined;
  - 7.7.2** A competent Audit Team Lead / Auditor is assigned as the evaluator of the trainee; and,
  - 7.7.3** The use of the Auditors and / or Audit Team Leads-in-training does not impact the ability of the audit team to address the audit scope and audit requirements.

## **8. Auditor and Audit Team Lead Qualification and Competence Requirements**

- 8.1** Audit Team Leads and Auditors performing third-party audits to API RP 75 and 30 CFR Part 250, Subpart S and shall meet the experience, skills, qualification and competence criteria established in this Section.
- 8.2** The Audit Team Lead shall meet the minimum qualification requirements identified below:
  - 8.2.1** Current certification as a safety and/or environmental management system auditor from a recognized auditor certification body (ACB) that includes an examination or other competency verification component.
  - 8.2.2** Conduct at least three (3) on-site, management system audits in the past three (3) years, with a minimum of one (1) on-site audit as an Audit Team Lead or as an Audit Team Lead under the direct supervision of a qualified, acting Audit Team Lead (co-Lead). The audit experience must be in accordance with an internationally recognized environmental, health and safety or process safety management system standard.
  - 8.2.3** A minimum of five (5) years of offshore, or related, oil and gas industry operations or safety and/or environmental management system audit experience within the previous eight (8) years.
  - 8.2.4** Previous experience auditing oil and gas industry or related operations.

- 8.2.5** Completion of COS SEMS Auditor Training in accordance with the requirements of COS-2-02.
- 8.2.6** Completion of COS SEMS Audit Team Lead Training in accordance with the requirements of COS-2-02.
- 8.3** Audit Team Members shall meet the minimum qualification requirements identified below:
  - 8.3.1** Qualified/deemed competent as a safety and/or environmental management system auditor in accordance with the ASP's documented process.
  - 8.3.2** A minimum of two (2) years of offshore, or related, oil and gas industry operations or safety and/or environmental management system audit experience within the previous five (5) years.
  - 8.3.3** Participated in at least three (3) on-site management system audits in the last three (3) years. Participation may include as an active member of the audit team, subject matter expert, observer, or as an active management representative or management member involved in a management system audit.
  - 8.3.4** Training and application of safety and/or environmental management system standards, management system auditing and audit techniques.
  - 8.3.5** Completion of COS SEMS Auditor Training in accordance with the requirements of COS-2-02.

## **9. Subject Matter Experts**

- 9.1** Subject matter experts must meet the following requirements, as verified by the ASP:
  - 9.1.1** Subject matter experts shall have a Bachelor's Degree or equivalent secondary education or work experience (minimum of eight (8) years) in the technical field relating to the subject matter area.
  - 9.1.2** Subject matter experts shall have at least five (5) years experience in the oil and gas or related industries.
  - 9.1.3** Subject matter experts shall have at least five (5) years of specific technical experience in the area where they have been deemed an expert.

**9.1.4** Subject matter experts who will participate in the audit shall complete a COS SEMS Auditor Training program that meets the requirements identified in COS-2-02, section 6.

## **10. Maintenance of Certifications and Competence**

**10.1** The ASP shall implement a process for ascertaining and validating that the certification and competence of Audit Team Leads and Audit Team Members is being maintained consistent with the requirements of COS-2-01.

**10.2** At a minimum, the process for maintaining competence shall include:

**10.2.1** Maintenance of the management system auditor qualification / certification as applicable.

**10.2.2** Participation in at least one (1) offshore SEMS audit every twelve (12) months as an Auditor or Audit Team Lead as applicable.

**10.2.3** Completion of at least seven (7) hours of refresher training and professional development each year relating to the application of API RP 75 and 30 CFR Part 250, Subpart S.

**10.2.4** Observation at least once every three (3) years by a competency evaluator assigned by the ASP. Individuals qualified as Audit Team Leads shall be observed in their roles leading SEMS audit teams.

**10.3** The ASP shall establish criteria and a process to identify competent evaluators for performing the competency evaluation and observation of Audit Team Leads and Auditors as required in 10.2.4.

**10.3.1** Evaluators are allowed to qualify as Audit Team Members.

**10.3.2** Individuals performing competency evaluations and observations of auditors to meet the requirements of 7 (Selecting Audit Teams) shall only be considered part of the audit team while performing audit activities that do not relate to the competency evaluation and observation. The evaluator shall minimally be qualified as an Audit Team Leader.