CENTER FOR
OFFSHORE
SAFETY

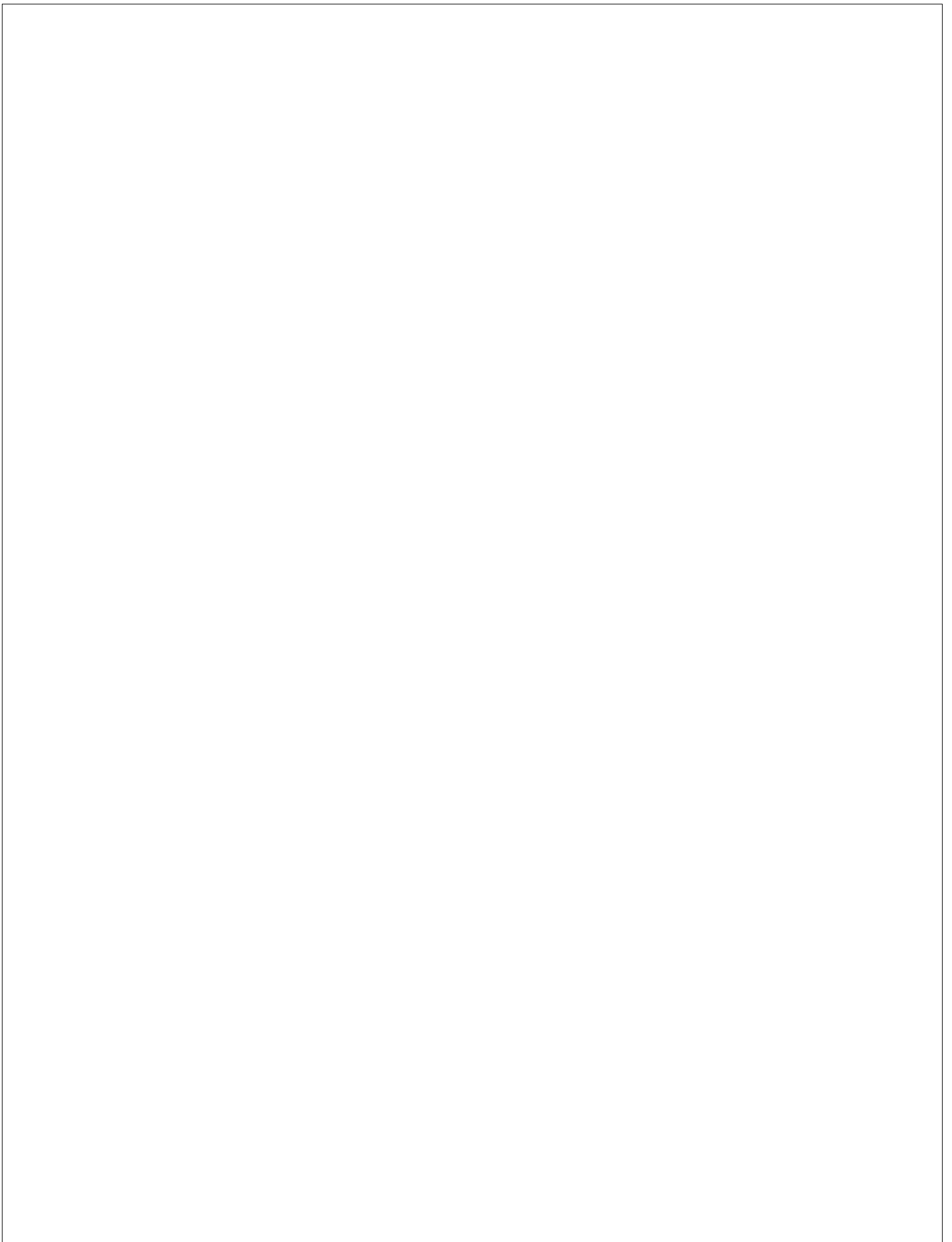# Training Program Requirements for Auditors and Audit Team Leads Performing Third-party SEMS Audits of Deepwater Operations

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 credibile 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.

Page 2

Training Program Requirements for Auditor and Audit Team Leads
Performing Third-party SEMS Audits of Deepwater Operations

SPECIAL NOTES

Center for Offshore Safety (COS) and American Petroleum Institute (API) publications necessarily address problems of a general nature. With respect to particular circumstances, local, state, and federal laws and regulations should be reviewed.

COS, API, and their respective employees, subcontractors, consultants, committees, or other assignees make no warranty or representation, either express or implied, with respect to the accuracy, completeness, or usefulness of the information contained herein, or assume any liability or responsibility for any use, or the results of such use, of any information or process disclosed in this publication. COS, API, and their respective employees, subcontractors, consultants, or other assignees do not represent that use of this publication would not infringe upon privately owned rights.

COS publications may be used by anyone desiring to do so. Every effort has been made to assure the accuracy and reliability of the data contained in them; however, the COS and API make no representation, warranty, or guarantee in connection with this publication and hereby expressly disclaim any liability or responsibility for loss or damage resulting from its use or for the violation of any authorities having jurisdiction with which this publication may conflict.

COS publications are published to facilitate the broad availability of offshore safety information and good practices. These publications are not intended to obviate the need for applying sound judgment regarding when and where these publications should be utilized. The formulation and publication of COS publications is not intended in any way to inhibit anyone from using any other practices.

Questions or clarification regarding this document may be directed to the Center for Offshore Safety, 1990 Post Oak Blvd, #1370, Houston, TX 77056 and Global Industry Services Department, American Petroleum Institute, 1220 L Street NW, Washington, DC 20005.

Questions concerning the interpretation of the content of API RP 75 or comments and questions concerning the procedures under which API RP 75 was developed should be directed in writing to the Director of Standards, American Petroleum Institute, 1220 L Street, N.W., Washington, D.C. 20005.

Requests for permission to use in other published works or translate all or any part of the material published herein should be addressed to Global Industry Services Department, American Petroleum Institute, 1220 L Street NW, Washington, DC 20005.

Training Program Requirements for Auditors and Audit Team Leads
Performing Third-party SEMS Audits of Deepwater Operations

Page 3

1. **Scope/Application**

   This document defines the requirements for training Audit Team Leads and Auditors that perform third-party SEMS (safety and environmental management system) audits of deepwater operations to API RP 75 and 30 CFR Part 250, Subpart S. These requirements are not intended for use outside U.S. Gulf of Mexico deepwater operations.

2. **Acronyms**

   2.1 **API** – American petroleum Institute

   2.2 **ASP** – Audit Service Provider

   2.3 **CFR** – Code of Federal Regulations

   2.4 **COS** – Center for Offshore Safety

   2.5 **EPA** – Environmental Protection Agency

   2.6 **HUET** – Helicopter Underwater Egress Training

   2.7 **ISO** – International Organization for Standardization

   2.8 **OSHA** – Occupational Health and Safety Administration

   2.9 **PPE** – Personel Protective Equipment

   2.10 **RP** – Recommended Practice

   2.11 **SEMS** – Safety and Environmental Management System

   2.12 **SME** – Subject Matter Expert

   2.13 **SPCC** – Spill Prevention, Control and Countermeasure

   2.14 **TWIC®** – 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.

Page 4

Training Program Requirements for Auditor and Audit Team Leads
Performing Third-party SEMS Audits of Deepwater Operations

3.3 **Competency Evaluator** – an individual assigned to assess the competence, skills, knowledge and ability of an Audit Team Member to conduct audits in accordance with the audit process requirements.

3.4 **Instructor** – an individual deemed competent to teach Auditors and Audit Team leads in accordance with the requirements of this document.

3.5 **Subject Matter Expert** – an individual who provides specific knowledge or expertise to the audit team.

3.6 **Training Provider** – a third-party organization that provides training to the Auditors and Audit Team Leads in accordance with COS requirements and publications.

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.

- **API RP 75**: *Recommended Practice for Development of a Safety and Environmental Management Program for Offshore Operations and Facilities*

- **COS-1-01**: *COS SEMS RP 75 Audit Protocol*

- **COS-2-01**: *Qualification and Competence Requirements for Audit Teams and Auditors Performing Third-party SEMS Audits of Deepwater Operations*

- **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 Third-party SEMS Audits and Certification of Deepwater Operations*

- **30 CFR Part 250, Subpart S**: *Oil and Gas and Sulphur Operations in the Outer Continental Shelf-Safety and Environmental Mangement Sytems*

- **ISO 19011**: *Guidelines for auditing management systems*

4.2 The following documents contain useful general information:

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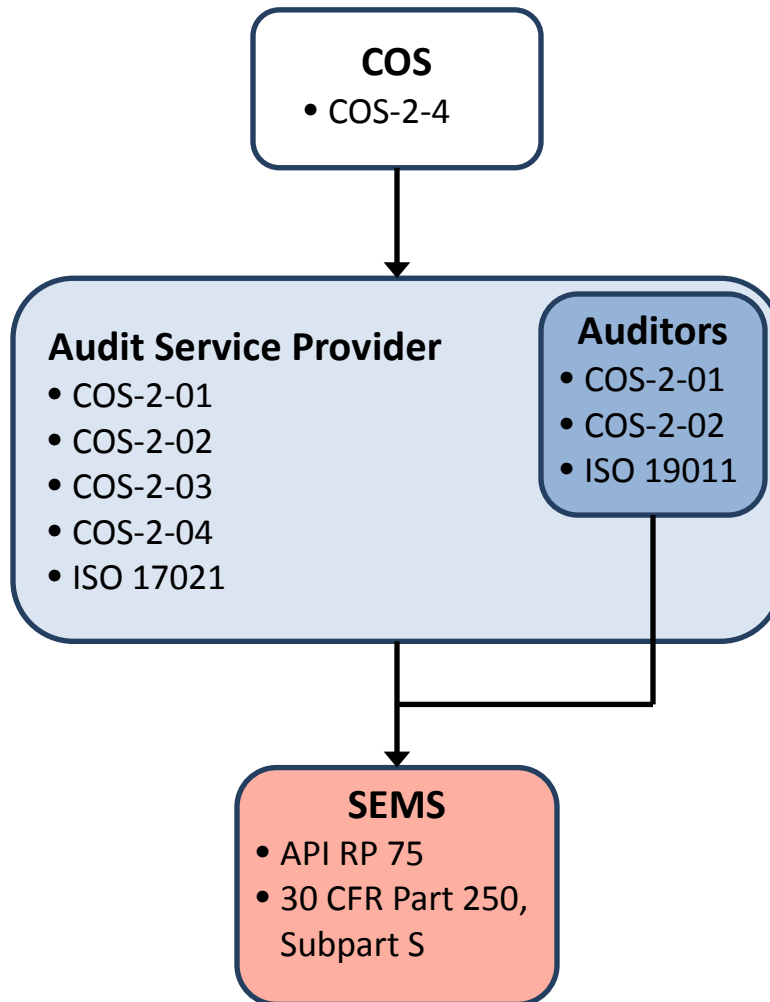
Training Program Requirements for Auditors and Audit Team Leads
Performing Third-party SEMS Audits of Deepwater Operations

Page 5

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 additonal confidentiality requirements agreed to between the ASP and the COS member company.

Page 6

*Training Program Requirements for Auditor and Audit Team Leads
Performing Third-party SEMS Audits of Deepwater Operations*

6. Auditor Training Program Requirements

6.1 SEMS Audit Training

6.1.1 This course shall provide for the training of auditors in the principles, requirements and practices of auditing as it relates to the requirements set forth in API RP 75 and 30 CFR Part 250, Subpart S.

6.1.2 The training shall address management system and process safety auditing techniques and practices; SEMS auditing in accordance with API RP 75 and 30 CFR Part 250, Subpart S regulatory requirements; and, special considerations for working in an offshore oil and gas operations environment.

6.1.3 The course shall include reference and instruction to the following documents:

6.1.3.1 API RP 75: *Recommended Practice for Development of a Safety and Environmental Management Program for Offshore Operations and Facilities*

6.1.3.2 30 CFR Part 250, Subpart S: *Oil and Gas and Sulphur Operations in the Outer Continental Shelf – Safety and Environmental Management Systems*

6.1.3.3 COS-2-01: *Qualification and Competence Requirements for Audit Teams and Auditors Performing Third-party SEMS Audits of Deepwater Operations*

6.1.3.4 COS-2-02: *Training Program Requirements for Auditors and Audit Team Leads Performing Third-party SEMS Audits of Deepwater Operations*

6.1.3.5 COS-2-03: *Requirements for Third-party SEMS Auditing and Certification of Deepwater Operations*

6.1.3.6 COS-1-01: *COS SEMS RP 75 Audit Protocol*

6.1.3.7 ISO 19011: *Guidelines for quality and/or environmental management system auditing*

6.2 Learning Objectives

6.2.1 Explain the purpose and intent of the SEMS standard;

6.2.2 Understand the scope and boundaries of the management system requirements;

Training Program Requirements for Auditors and Audit Team Leads
Performing Third-party SEMS Audits of Deepwater Operations

Page 7

6.2.3 Understand the various phases, stages and operations related to offshore exploration and production activities;

6.2.4 Explain the intent and requirement of each of the SEMS elements included in API RP 75 and 30 CFR Part 250, Subpart S;

6.2.5 Understand the application of standards referenced in API RP 75 and 30 CFR Part 250, Subpart S, and other relevant industry standards;

6.2.6 Identify the audit evidence needed to demonstrate conformity to the requirements of SEMS and use the COS audit tools, protocols and checklists;

6.2.7 Evaluate the effectiveness of an entire SEMS, including, but not limited to, operations such as: (1) Organization of Operator-Contractor SEMS relationships and interfaces; (2) Logistics Support Structure (e.g., how materials/equipment flows from shore to offshore) and how this interacts with the SEMS (e.g., transportation/manifest of hazardous materials to and from platform to shore-base, hose breaks), (3) Organization of Operator-Operator SEMS relationships and interfaces, including tie-backs to host platforms and joint venture relationships;

6.2.8 Identify the risks and hazards of offshore operations;

6.2.9 Understand environmental, health and safety critical equipment, including critical functions, testing and maintenance considerations;

6.2.10 Understand the competency requirements for SEMS audit teams;

6.2.11 Describe the audit process of a SEMS program including, but not limited to:

> **6.2.11.1** Headquarters and facility audit objectives;
>
> **6.2.11.2** Audit planning process;
>
> **6.2.11.3** Potential audit outcomes;
>
> **6.2.11.4** Reporting;
>
> **6.2.11.5** Corrective actions;
>
> **6.2.11.6** Certification process; and
>
> **6.2.11.7** Maintaining certification/audit cycle.

6.2.12 Understand the role of relevant regulators, including communications and reporting requirements;

Page 8

*Training Program Requirements for Auditor and Audit Team Leads
Performing Third-party SEMS Audits of Deepwater Operations*

6.2.13 Understand the application of API RP75, 30 CFR Part 250, Subpart S, and agency jurisdictions and regulatory relationships (i.e., Coast Guard, EPA, OSHA, SPCC, etc.);

6.2.14 Understand the role of the COS, reporting and data tracking; and,

6.2.15 Understand the requirements and challenges involved in working in an offshore environment, as they relate to personal safety, accommodations and travel.

6.3 Course Prerequisites

Each student shall be required to have studied the current published version of API RP 75, 30 CFR Part 250, Subpart S, and the current version of the COS-1-01 prior to attending the course.

6.4 Course Duration

6.4.1 The total course time devoted to direct instruction and to assigned team and individual activities shall be a minimum of 24 hours that includes three (3) hours for knowledge and skills evaluation.

6.4.2 Time devoted to meals, breaks or other free time shall not be included in the calculation of the course duration.

6.4.3 The course shall typically be presented within a five (5) day period.

7. Audit Team Leads - Assessment Planning and Logistics for SEMS Audits

7.1 Audit Team Leads shall complete the requirements defined in this section and Section 6 of this document.

7.2 The training shall provide Audit Team Leads guidance in the planning and logistic challenges they must prepare for in advance of offshore assessments.

7.3 To fulfill the learning objectives, an Audit Team Lead that successfully completes the course shall be able to meet the requirements of 6.2 and:

7.3.1 Explain the purpose and applicability of the COS procedures;

7.3.2 Determine the audit duration based upon activity type and complexity of operations;

7.3.3 Integrate logistical considerations (travel) into overall audit plan;

Training Program Requirements for Auditors and Audit Team Leads
Performing Third-party SEMS Audits of Deepwater Operations

Page 9

7.3.4 Select audit team(s) members giving consideration to skills, knowledge, training/certifications *(*HUET, TWIC®, other), team size limitations, etc. to achieve the objectives of the audit;

7.3.5 Manage the facilities logistics of an audit focusing on subjects such as, but not limited to: point of origin considerations, transportation, schedules, lodging, opening/closing meetings*,* escorts, etc.;

7.3.6 Manage unforeseen circumstances, including consideration for emergencies*,* weather, work interruptions, and need for flexibility;

7.3.7 Communicate plan for parallel team coordination (planning areas of focus, monitoring and sharing progress reports); routine check-in for team members (safety, assurance of arrival to location); planning for limited resources (e.g., phone lines, internet service, etc.);

7.3.8 Understand auditing ethics and professionalism;

7.3.9 Ascertain PPE requirements for the audit team;

7.3.10 Communicate requirements related to living in an offshore environment – shared living, standards for accommodation (e.g., what can be worn in meal room – hat, boots, coveralls); personal luggage allowances, etc.;

7.3.11 Identify the information that should be considered in advance of the audit to assist with planning and coordination, such as: organization of COS member and interrelationship with contractors; specific operational information of the facility to be audited; specific safety, security, living and travel requirements; specific facility and process information, etc.; and,

7.3.12 Understand the coordination activities, as appropriate, between participants and other witnesses of the audit, including regulatory personnel.

7.4 The course material shall typically be presented within a two (2) day period. The total course time devoted to direct instruction, to assigned team and individual activities shall be eight (8) hours including one (1) hour of professional ethics and one (1) hour of examination. Time devoted to meals, breaks or other free time shall not be included in the calculation of course duration.

8. Training Providers

8.1 Instructors

8.1.1 Criteria and processes for qualifying instructors shall be established, documented and maintained by training providers.

Page 10

Training Program Requirements for Auditor and Audit Team Leads
Performing Third-party SEMS Audits of Deepwater Operations

8.1.2 All instructors shall demonstrate:

    8.1.2.1 Competence in the principles and practices of the jobs, skills and knowledge associated with the course's learning objectives;

    8.1.2.2 Ability to facilitate the learning and development of the knowledge and skills associated with the course's learning objectives; and,

    8.1.2.3 Familiarity with the current course materials and documentation.

8.2 Course Materials

8.2.1 Each student shall receive a complete set of course materials to supplement the training program. (Examples of typical auditor documents, reports, and forms shall be included.)

8.2.2 Each student shall receive a copy of the current published version of the reference materials for use during the course.

8.2.3 Instructor materials shall contain sufficient information to ensure consistency of meeting the learning objectives among varying instructors.

8.3 Training Methods

8.3.1 Training courses shall be designed to have a high degree of interaction between students and instructors. Training methods shall be designed to involve and engage students throughout the duration of the course.

8.3.2 The training course shall include both knowledge-based sessions (to facilitate understanding of concepts) and skill-based sessions (application of knowledge and skills in practical activities).

8.3.3 Methods for validating student achievement of the learning objectives and for providing timely feedback shall be included in the course.

8.3.4 Training aids, such as commercial training videos, videos produced during the course to record and review the performance of student, CDs, or interactive training tools that are directly relevant may be used to supplement the training by the instructors.

8.3.5 Instructors shall demonstrate effective management of the course, including attention to time schedule, course content, requirements of the standard, instructor conduct, and other course requirements.

9. Class Size; Attendance

9.1 The ratio of the number of students to instructors shall not exceed 10 students per instructor.

9.2 Students shall be required to be in attendance for the full duration of the course in order to receive a certificate of successful completion.

9.3 The training hours / durations identified in 6.4 and 7.4 for Auditors and Audit Team Leads shall be followed without exception unless otherwise authorized by the COS.

10. Examination of Students

10.1 The student's knowledge of the learning objectives defined in 6.2 and 7.3, and skills verification shall be evaluated through a written examination.

10.2 Questions shall provide appropriate coverage of the relevant course materials and activities.

10.3 At least 20% of the examination grade shall be based on questions that require essay responses or evaluation of audit scenarios that test the students' comprehension of the course materials and the application of API RP 75 and 30 CFR Part 250, Subpart S. Questions shall be designed to solicit responses that demonstrate the student's ability to analyze and synthesize information.

10.4 During the examination, students are allowed to reference any personal notes taken during the course.

10.5 A minimum passing grade of 80% is required on both written examination and in-course evaluations.

10.6 One re-examination is allowed. The re-examination questions and content shall be different than the original examination questions and content. If the retake is failed, the course must be repeated. Prior to the re-examination, a training needs analysis must be performed and additional training provided to address competency gaps.

11. Course Certificate

A certificate of successful completion shall be provided to each student who has attended the full session and passed the documented examination. The certificate shall include:

- Course title;
- Dates of the course;
- Name of the organization providing the training;

Page 12

*Training Program Requirements for Auditor and Audit Team Leads
Performing Third-party SEMS Audits of Deepwater Operations*

- Name of the student; and,

- Unique identification number for each certificate.

12. Course Administration and Recordkeeping

Documented procedures for the effective administration of the Audit Team Lead and Auditor training courses shall be maintained. Areas covered shall include:

12.1 Presentation material of the course;

12.2 A document control system for maintaining the currency of procedures and course materials;

12.3 Selection of instructors, including criteria for determining satisfactory instructor performance;

12.4 Records of individual students and each course offering, including analysis of course results; and,

12.5 Examination and applicable re-examination process, including security and confidentiality of examination questions and answers, and associated documents.

13. Course Changes

13.1 COS-accredited ASPs shall provide notice to COS of any course changes that impact content or delivery of the courses.

13.2 Verification that course changes have been implemented by instructors shall be performed within 30 days of publication of the changes.

14. Outsourcing of Training / Training Providers

In the event of an Audit Service Provider outsourcing training to a training provider or other training organization, it will be included in the COS office assessment to verify that the requirements of COS-2-02 are being met. This may include COS audits at the training provider site(s) as part of the office assessment process.

Training Program Requirements for Auditors and Audit Team Leads
Performing Third-party SEMS Audits of Deepwater Operations

Page 13