

Remote Auditing – **Ten Golden Rules**

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Introduction

Regular environmental audits are an important part of an Environmental Management System and help to keep an organisation on track in managing its impacts and risks.

Usually the audit is done actually on site, walking around, viewing files, speaking to staff. Rather than everything grinding to a halt during these challenging times with premises closed and workers confined to home, organisations realise it is better to do something and keep up the momentum of the audit programme. Remote audits – which are conducted partially or completely off site, using technology to support the auditor – are now increasingly common.

Following on from the IEMA webinar delivered in April 2020 and written by the webinar presenters, this document introduces the *Golden Rules of Remote Auditing*. Rather than detailed training on how to do a full environmental audit, this covers the key considerations to be made when planning and conducting audits remotely. The golden rules have been compiled from the perspectives of both auditor and auditee. Whichever your role, if you follow this advice, you should have a successful remote audit for all concerned.

See also IEMA's recently published Value of Environmental Auditing

1. <u>Set clear and achievable remote audit objectives</u>

For any audit, ensuring it is focused on the right subjects and will add value to the organisation is critical. For remote audits, there may be a different focus needed so it is important that the objectives are agreed and clearly communicated.

- Set the scope. There are audit coverage areas which better lend themselves to remote auditing. Try to identify these and include them in the remote audit schedule. However, do ensure that these audits provide real additional or alternative benefit, rather than being a standard audit with the site inspection component missing.
- Remote auditing can be beneficially focused at strategic levels. For example, rather than evaluating site operational control, include an assessment of senior leadership engagement in the sustainability strategy, perhaps gather feedback on the direction of the organisation, or assess the business's resilience to climate change. These subjects tend to be heavily focused on interviewing and documentation assessment, so are very suited to remote audits.
- Consider the audit's likely boundaries, such as areas where later site inspection-based confirmation may be necessary, or alternative routes to fill these gaps.
- Whatever the scope & schedule, it important that the auditor and auditee are very clear on the specific audit objectives so these can be fully met.

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2. <u>Develop effective plans to support the remote audit</u>

As with all audits, it is essential that a comprehensive plan is drawn up and agreed by both the auditor and auditee before the audit takes place, to ensure its success and effectiveness.

- Both parties need to agree in advance: areas to cover, timings, who to speak to and the scope of the audit. Once agreed, send out an audit agenda to all involved to help them prepare.
- Consider how to structure the audit; one full day working remotely may not work effectively whereas shorter focussed sessions over a couple of days may work better.
- Book interviews and opening / closing meetings in advance into all auditees' diaries to ensure availability.
- If needs be, change the focus of the audit to add 'different value'.
- The auditor should consider using a more rigid pre-set of topics to cover and audit trails to follow. This also helps to keep an online conversation focused on the areas you want to cover.
- Auditors must explain very clearly what you want to see and agree 'reasonable' coverage with the auditee beforehand.
- Interviews should be targeted and focused; keep them as short as possible and, if needs be, break out into focus topics.
- During the audit, the auditor could work 'off-line' checking data and documents, then come back to the call with questions for the auditee.

3. Know the technology, its capabilities and limitations

Being unable to visit the site means there will be a heavy reliance on technology, to conduct interviews, view documentation and see the site. It's important to trust the technology – although we do realise many are still learning.

- Choose the technology that is likely to work best depending on needs and activity. For example, Zoom or Teams for interviews and screen sharing; Whatsapp for chat/messaging, sharing photos etc; Facetime for interviews and walkabouts. Consider the needs of both the auditor and auditee.
- Make sure the technology is ready. Ensure laptops and phones are suitable, that the software is loaded up already, microphone and earpieces work, and passwords are available.
- Recording devices used on walkabouts should have sufficient capacity (e.g. memory for activities being recorded, or battery power where the activity or audit takes a long time to complete).
- Consider if there are any security issues with accessing the technology.
- Test beforehand so it works. Try at different times of the day or parts of the site, which may cause issues with connectivity.
- Do a practice run so everyone involved is comfortable how to use the technology.
- Consider the management of site inspections and indeed the whole audit in the event of a total technology failure.



4. Make all participants familiar with the remote audit

Remote auditing can affect both auditors and auditees, who may not feel comfortable outside the traditional face-to-face audit.

- Discuss the principles for remote auditing and answer any questions, either before or at the start of the audit.
- Consider the benefits of agreeing the remote audit protocols, so that all see the positive side of remote rather than in-person audits.
- Allow time to establish a relationship between the auditor and auditee.
- Allow questions to confirm or reconfirm understanding of remote audit trails.
- Establish breaks every 60 minutes to ensure that all parties remain fresh.
- Provide updates on the progress of the audit and signpost the next audit trails.

5. Ensure the confidentiality and security of the audit

Auditees may have concerns about sharing confidential documents, so the security of electronically transmitted documents can be more important than in traditional audits.

- Review and update non-disclosure/confidentiality agreements to ensure that remote auditing processes and document exchange are incorporated.
- Select software tools and services to take into account the organisational confidentiality requirements.
- Use software which allow documents to be viewed rather than exchanged by email.
- Consider the implications of GDPR and the commercial sensitivity of data, with agreements to cover the management of recordings or other data transferred during observations at the outset.
- Recording of interviews and screen shots of documents should not usually be permitted.
- Documents made available to the auditor should be discarded or destroyed.

6. <u>Be familiar with the way to review documents remotely</u>

Both parties may not be used to conducting audits remotely and the nuances of reviewing documents this way.

- Be prepared to review documentation in a staged approach. It may be best to start with higher level systems documents or reports, and then plan a further stage to review detailed records, by request.
- Make sure the required documents are available electronically and accessible remotely in a timely manner. Consider that access to records may be different, e.g. waste transfer notes or other records may only be kept as hardcopy.
- Undertaking an advanced review of documentation allows the auditor to developed targeted questions during the audit.
- The audit agenda will give an indication of the type of documents needed; having these collated in one place helps to avoid searching for them during the audit.



- Consider what documents or other on-line resources can help to build confidence, if a site-based inspection is not possible. For example, remote sensing techniques or simple satellite mapping could help understand the site features, setting and receptors.
- Be organised when reviewing documents, so that the auditor can decide whether further items or other methods are needed to provide robust audit evidence. For example, where records show that maintenance checks are undertaken, requesting a photograph will confirm actual current conditions.

7. Break down any barriers to successful remote interviews

It is always important to have a good rapport between all involved, so try to develop a relaxed, trusting, though respectful atmosphere. This helps to get the best from the audit – the information, detail and co-operation.

- Choose a suitable location for the remote interview to put people at ease. Having the boss listening in will be off-putting.
- Keep to the schedule if the audit is running late, let everyone know.
- Take time to build trust, don't just rush into the questions. Explain objectives and what is involved with the audit. Mutual respect leads to co-operation.
- Be considerate of people's situation someone may be home- working and schooling, which can be stressful.
- Documents, information or people being unavailable will stall the audit process. Keep the interview flowing with good preparation confirm in advance what will be covered, what and who may be needed.
- During the audit planning, it may have been agreed that interviewees will be supported by a mentor or manager; if so, ensure they are available in good time.
- Consider that there will be restricted communication body language and other subtleties may be missed.

8. <u>Consider the requirements for virtual site tours and observation</u>

Whatever technology is being used, there are some common elements that need consideration before embarking on remote observation.

- Safety first remember that any remote tour of a facility or witnessed activity can have additional hazards for the auditee.
- Consider the risks to the operator and other personnel as they move from place to place (e.g. up and down stairs, or through busy or hazardous locations).
- Check that the remote audit tools work in practice, e.g. sufficiently strong wi-fi or telephone signal, any barriers blocking the signal like thick or metallic walls.
- Test all equipment before starting the virtual tour to ensure that it operates correctly.
- Consider the practicalities of handling a camera while moving about or being in close proximity to others. Having another person to do the recording itself may help. Or use equipment such as a selfie-stick, tripod or other devices to hold the camera (e.g. headcams).
- Check in advance that transmitting devices are allowed on-site or if there are any areas that are access restricted.
- Have a fallback position in the event that live streaming is not possible, such as video recording for viewing later, or photographs with a commentary from the auditee.



• Show the auditor all they want to see of the site. Don't be afraid to go back to check operational control issues further.

9. Have clear processes to review audit evidence and report conclusions

Remote auditing can be highly effective as long as there are good processes in place to review the outputs following the auditing 'do' stage.

- Give thought whilst planning the audit to the evidence to be provided, and how the auditor can ask questions about the evidence. Design in regular and frequent review periods to ensure the auditor has access to the necessary people at given points, to ask follow-up questions or request more information.
- Set time aside to review findings at each stage of the audit process, including the closing meeting. This will enable findings (including non-conformance reports and good practices) to be discussed and addressed in a timely manner.
- Document the review stages and confirm with the auditor, so that the relevant people from the organisation can be available for a meeting/call at necessary times throughout the process. This provides a smooth process for the audit to follow.

10. <u>Be aware of any specific requirements for regulators or certification bodies</u>

Remote internal audits conducted by certified organisations or testing laboratories are often reviewed by certification / accreditation bodies to ensure that they satisfy the relevant international standards or other compliance requirements.

- Liaise with your regulatory bodies to confirm any changes to your audit / inspection schedules. They should provide details of timetable & any documentation they may wish to see, perhaps for review later.
- Read the Regulatory Position Statements issued by the Environment Agency or other regulators to consider during the Covid-19 period of disruption.
- Familiarise yourself with the requirements of the international standard and supporting documentation.
- Access freely available information, guidance and mandatory/policy documents that can provide excellent direction on how to satisfy some of the trickier clauses of the standards.
- Audits may be undertaken against the requirements of not only the international standard but also particular 'schemes', where you will need to be aware of scheme requirements and include them in your planning.



Further Information:

- IEMA Watch the webinar Adapting to Covid-19 Remote Auditing
- UKAS An Introduction to Remote Assessments and Remote Assessment FAQs
- BSI Safe Working During the COVID-19 Pandemic: General Guidelines for Organisations
- International Accreditation Forum (IAF) <u>The Use of Information and Communication</u> <u>Technology (ICT) For Auditing/Assessment Purposes</u> and <u>Management of Extraordinary Events or</u> <u>Circumstances Affecting ABs, CABs and Certified Organizations</u>
- ISO ISO 9001 Auditing Practices Group Guidance on Remote Audits
- ISO ISO 19011:2018 Guidelines for auditing management systems
- Environment Agency COVID-19 regulatory position statements

IEMA - See also the recently published <u>Value of Environmental Auditing report</u>.

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