COS-2-01

QUALIFICATION REQUIREMENTS FOR AUDIT SERVICE PROVIDER PERSONNEL INVOLVED IN PERFORMANCE OF SEMS AUDITS

SECOND EDITION | JAN 2024

SEMS AUDIT & CERTIFICATIONS

GOOD PRACTICE DEVELOPMENT

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1. SCOPE / APPLICATION

This document defines the minimum qualification requirements for persons working for Audit Service Providers (ASPs) accredited by the Center for Offshore Safety (COS) to perform Safety and Environmental Management System (SEMS) audits to API Recommended Practice (RP) 75[1] and COS-2-03[2] *SEMS Auditing Requirements*.

NOTE: Wherever the term ASP is used in this document, the requirements shall apply to ASP as well as applicants for COS accreditation.

2. ACRONYMS

- **AB** - accreditation (accrediting) body (the COS)
- **ACB** - Auditor Certification Body
- **ANSI** - American National Standards Institute
- **API** - American Petroleum Institute
- **ASP** - Audit Service Provider
- **ASPMS** - Audit Service Provider Management System
- **CFR** - Code of Federal Regulations
- **COS** - Center for Offshore Safety
- **IAF** - International Accreditation Forum
- **IEC** - International Electrotechnical Commission
- **ISO** - International Organization for Standardization
- **RP** - recommended practice
- **SEMS** - Safety and Environmental Management System
- **SME** - subject-matter expert

3. DEFINITIONS

- **Accreditation (accrediting) body** - An independent third-party organization that accredits ASPs with qualifying management systems and processes for performing SEMS audits, the COS.
- **Applicant** - An independent third-party entity that is seeking accreditation from the COS to be able to perform SEMS audits.

[1]This document applies to either the 3rd or 4th Edition of API RP 75 depending on the scope of the audit.
[2]This document applies to either the 1st or 2nd Edition of COS-2-03 depending on the scope of the audit.

- **Auditor** - A person with the demonstrated personal attributes and competence consistent with the requirements described herein.

- **Audit Service Provider (ASP)** - A COS-accredited, independent third-party organization contracted by a company to audit its SEMS to the requirements of API RP 75 and COS-2-03. An ASP must be accredited or provisionally accredited.

- **Audit Service Provider Management System (ASPMS)** - An applicant/ASP's management system for conducting SEMS audits, meeting applicable requirements of ISO/IEC 17021-01 and the COS.

- **Auditor Certification Body (ACB)** - A recognized entity that qualifies and certifies management system auditors and that is independent of the ASP.

- **Awareness** - When people understand their responsibilities and how their actions contribute to the achievement of the organization's objectives (ISO 9000:2015, 2.2.5.4).

- **Competence** - The ability to apply knowledge and skills to achieve intended results (ISO 17021-1:2015, 3.7).

- **Provisional accreditation** - Temporary accreditation of an ASP that has satisfied application and office assessment requirements, and for which a witness assessment of their SEMS audit will be conducted.

- **Subject-matter expert (SME)** - An individual working for the ASP who provides specific knowledge or expertise to the audit team.

4. REFERENCES AND GENERAL INFORMATION

4.1   The referenced documents, or parts of the referenced documents, shown in Appendix 1, Part A shall constitute provisions of this document.

4.2   Additional documents shown in Appendix 1, Part B contain useful information.

4.3   As new editions of the referenced and additional documents are published, the AB shall issue guidance on their implementation.

5. IMPARTIALITY AND CONFIDENTIALITY OF INFORMATION

5.1 ASPs shall:

5.1.1.   Ensure SEMS auditors and others involved with their SEMS audit program meet the ASP's impartiality requirements, regardless of their employer.

5.1.2.   Ensure SEMS auditors and others involved with their SEMS audit program have agreed to comply with their policies concerning confidentiality of client information and any additional confidentiality requirements agreed to between the ASP and the auditee.

5.1.3.   Maintain records to demonstrate conformance with 5.1.1.and 5.1.2.

6. GENERAL REQUIREMENTS

6.1   ASPs shall establish, implement, and maintain a documented program as part of their Audit Service Provider Management System[3] (ASPMS) for initial qualification, ongoing monitoring, and requalification of persons involved in their SEMS auditing program that meets or exceeds the requirements of this document.

6.2   Persons involved in the SEMS auditing program shall include, but not be limited to:

- accreditation managers;

- SEMS audit planners (i.e., those reviewing auditee information, identifying sites to be audited, the audit team, and audit duration);

- audit team leaders;

- audit team members;

- audit team leaders;

- subject-matter experts; and

- SEMS audit report approvers.

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[3]Requirements for an ASPMS are defined in COS-2-04, 2nd Edition: *Requirements for Accreditation of Audit Service Providers Performing SEMS Audits; January 2024.*

6.3 Appropriate to their roles, persons involved in the ASP's SEMS auditing program shall be competent or aware with respect to offshore energy, SEMS, and management systems auditing, as well as the documents and subject-matter areas shown in Appendix 3. The ASP shall document the requirements for competence and shall maintain records of conformance to those requirements.

6.4 ASPs shall assure that persons performing roles in their SEMS auditing program satisfy the qualification requirements defined in their ASPMS, regardless of their employer.

6.5 Documents associated with an auditee's SEMS program shall be maintained for six years (or longer if required by local regulations).

6.6 ASPs shall assure that qualification requirements are satisfied through the combination of experience and/or training, as appropriate for their role, and conform to the requirements for competence established for that position.

6.7 ASPs shall verify the qualifications of persons involved in the auditing program prior to them performing in their assigned role.

7. CONTEXT OF THE INDUSTRY

7.1 The context of the industry being audited encompasses a variety of factors, including, but not limited to, the:

- type of business being audited (e.g., oil and gas, wind);

- geographic location (e.g., inside or outside the US OCS);

- governmental authority;

- organizational control;

- number and type(s) of facility(ies)/asset(s);

- site-related factors, such as the risks and complexity related to selected facility(ies)/asset(s); and

- scope of the intended audit.

7.2 Appropriate to persons' roles in the auditing program, ASPs shall define and document competency and awareness requirements for the context of the industry being audited. Requirements may include, but not be limited to, having:

- served in an audit role, consulted or worked within the industry being audited; and/or

- been trained about the industry.

7.3 ASPs shall document how these competency and awareness requirements are evaluated, monitored, maintained, and updated as needed.

8. ASP ACCREDITATION MANAGER

8.1   ASPs shall designate an accreditation manager, who, irrespective of other duties within the ASP's organization, shall be responsible for maintaining the ASPMS documentation and interacting with the COS on accreditation matters.

8.2   Before having sole responsibility as the accreditation manager, the individual shall:

- have attended and passed a course on ISO 17021-1 offered by the ANSI National Accreditation Board (or local equivalent); or

- have managed an accreditation program conforming with ISO 17021-1 for at least 18 months; or

- have served at least six months in the role of accreditation manager under the direction of someone meeting the requirements of one or both bullets above

9. SEMS AUDIT PLANNERS

9.1   Audit planners shall be responsible for evaluating auditees' requests for SEMS audits and determining the audit scope, team, and duration needed to meet audit objectives.

9.2   Audit planners shall have received a minimum of four hours of training in the application of audit planning documents (e.g., COS-1-06, IAF MD 5 and 11, ISO/IEC 17021-1, ISO/IEC TS 17023) or have served at least two years in a SEMS audit planning role for an ASP.

10. SEMS AUDIT TEAM LEADS

10.1   Audit team leads shall be responsible for managing the audit team in accordance with the audit plan to achieve the audit objectives.

10.2   Audit team leads shall have a certification as an environmental and/or health and safety management system auditor from an Auditor Certification Body that is independent of the ASP. The certification must be in effect during the entire time they are leading an audit (i.e., from audit preparation until delivery of the final audit report).

10.3   Audit team leads shall have received a minimum of four hours of initial training in writing SEMS audit findings, classification of findings, and content of audit reports (e.g., from COS-1-08).

10.4   Prior to first leading a SEMS audit team, the person shall have:

•   served on at least one SEMS audit team under the direction of another audit team lead; or

•   served as audit team lead on at least three environmental and/or health and safety management system audits within the prior two years.

11. SEMS AUDIT TEAM MEMBERS

11.1   Audit team members shall perform their assigned roles in the audit as defined in the audit plan or as determined by the audit team lead.

11.2   Audit team members shall have received a minimum of four hours of initial training in writing SEMS audit findings, classification of findings, and content of audit reports (e.g., from COS-1-08).

11.3   Prior to first serving as an audit team member, the person shall have:

•   performed at least one environmental and/or health and safety management system audit prior to serving on a SEMS audit team within the prior two years; and

•   observed at least eight hours of a SEMS audit within the prior year.

12. SUBJECT-MATTER EXPERTS

12.1   SMEs shall work for the ASP when required to provide specific knowledge or expertise to the audit team.

12.2   Guides, or other persons supplied by the auditee to observe or assist with the audit, are not subject to these SME requirements.

12.3   ASPs shall define requirements for SMEs appropriate to the subject matter needed.

13. AUDIT REPORT APPROVERS

13.1   Audit report approvers shall review audit findings and report content prior to approving the report for delivery to the auditee.

13.2   Audit report approvers shall have received a minimum of four hours of initial training in writing management system audit findings, classification of findings, and content of audit reports (e.g., from COS-1-08).

14. SELECTING AUDIT TEAMS

14.1   ASPs shall select and appoint members of the audit team, including an audit team lead, taking into account both the joint and individual competence needed to achieve the objectives of the audit.

14.2   The ASP shall have a documented process for selecting and appointing members of the audit team.

14.3   The audit team shall consist of a sufficient number of persons (including audit team members and SMEs) to achieve the audit objectives.

15. ONGOING MONITORING AND ASSURANCE OF QUALIFICATIONS

15.1   ASPs shall implement a documented process for ascertaining and validating that the people involved in their SEMS auditing program remain qualified.

15.2   At a minimum, the process shall include:

- feedback mechanism(s) from auditees about performance;

- evaluation of opportunities for improvement, such as from performance reviews, internal audits, management reviews, and COS assessments;

- no less than an annual review that audit team leaders' certifications remain in effect;

- performance reviews of auditors by the audit team leader;

- evaluation of audit team leader performance as an audit team leader at least every three years by a person under the control of the ASP who is also qualified as an audit team leader;

- refresher training no less than annually, including (as applicable to their responsibilities):

    o   changes to requirements (e.g., local regulations, API RP 75, COS requirements, ISO, ASPMS);

    o   API RP 75 learnings;

    o   improving audit techniques;

    o   improving audit findings and reports; and

    o   COS guidelines related to SEMS auditing.

APPENDIX 1 - REFERENCES AND GENERAL INFORMATION

A. REFERENCED DOCUMENTS

1. **API Recommended Practice 75, 3rd Edition:** *Recommended Practice for Development of a Safety and Environmental Management Program for Offshore Operations and Facilities;* May 2004.

2. **API Recommended Practice 75, 4th Edition:** *Safety and Environmental Management System for Offshore Operations and Assets;* December 2019.

3. **Center for Offshore Safety Publication COS-2-03, 3rd Edition:** *Requirements for Third-party SEMS Auditing;* May 2023.

4. **Center for Offshore Safety Publication COS-2-04, 2nd Edition:** *Requirements for Accreditation of Third-party Audit Service Providers Performing SEMS Audits;* January 2024.

5. **Center for Offshore Safety Publication COS-1-06 for RP 75, 3rd Edition:** *Guidance for Developing a SEMS Audit Plan,* Second Edition; December 2023.

6. **Center for Offshore Safety Publication COS-1-06 for RP 75, 4th Edition:** *Guidance for Developing a SEMS Audit Plan,* Second Edition; August 2023.

7. **Center for Offshore Safety Publication COS-1-08 for RP 75, 3rd Edition: SEMS Audit Report Format and Guidance, Second Edition;** May 2023.

8. **Center for Offshore Safety Publication COS-1-08 for RP 75, 4th Edition:** *SEMS Audit Report Format and Guidance,* Second Edition; August 2023.

9. **ISO/IEC 9001:2015, 5th Edition: *Quality Management Systems – Requirements;*** September 2015.

10. **ISO/IEC 17021-1:2015, 1st Edition:** *Conformity Assessment – Requirements for bodies providing audit and certification of management systems – Part 1: Requirements;* June 2015 (certain exceptions apply; see Appendix 2).

B. DOCUMENTS CONTAINING USEFUL INFORMATION

1. **Center for Offshore Safety Publication COS-1-07 for RP 75, 3rd Edition:** *Guidance for Developing a SEMS Corrective Action Plan,* Second Edition; May 2023.

2. **Center for Offshore Safety Publication COS-1-07 for RP 75, 4th Edition:** *Guidance for Developing a SEMS Corrective Action Plan,* Second Edition; August 2023.

3. **Center for Offshore Safety Publication COS-1-09/RP 75, 3rd Edition:** *Guidance for Conducting SEMS Audits – For API Recommended Practice 75, 3rd Edition,* Second Edition; June 2023.

4. **Center for Offshore Safety Publication COS-1-09/RP 75, 4th Edition:** *Guidance for Conducting SEMS Audits,* First Edition; May 2023.

5. **Center for Offshore Safety Publication COS-1-10:** *Guidance for Remote Audits,* First Edition: May 2023.

6. **Center for Offshore Safety Publication COS-2-01, 1st Edition:** *Qualification and Competence Requirements for Audit Teams and Auditors Performing Third-party SEMS Audits of Deepwater Operations;* October 2012.

7. **Center for Offshore Safety Publication COS-2-02, 1st Edition:** *Training Program Requirements for Auditors and Audit Team Leads Performing Third-party SEMS Audits of Deepwater Operations;* October 2012

8. **Center for Offshore Safety Publication COS-2-05:** *Requirements for COS SEMS Certificates,* First Edition; July 2020.

    i.   International addendum, May 2023

9. **Center for Offshore Safety Publication COS-2-06:** *Requirements for Accreditation of Audit Service Providers Issuing SEMS Certificates,* First Edition; January 2024.

10. **International Accreditation Forum Mandatory Document IAF MD 5: 2023:** *Determination of Audit Time of Quality, Environmental, and Occupational Health & Safety Management Systems;* Issue 4, Version 3; June 2023.

11. **International Accreditation Forum Mandatory Document IAF MD 11: 2023:** *IAF Mandatory Document for the Application of ISO/IEC 17021 for Audits of Integrated Management Systems;* Issue 1, Version 4; June 2023.

12. **ISO 19011:** *Guidelines for auditing management systems,* Third Edition; July 2018.

13. **ISO/IEC 17021-1:** *Conformity assessment – Requirements for bodies providing audit and certification of management systems – Part 2: Competence requirements for auditing and certification environmental management systems,* First Edition; December 2016.

14. **ISO/IEC 17021-1:** *Conformity assessment – Requirements for bodies providing audit and certification of management systems – Part 10: Competence requirements for auditing and certification of occupational health and safety management systems,* First Edition; March 2018.

15. **ISO/IEC TS 17023 (2013):** *Conformity assessment – Guidelines for determining the duration of management system certification audits* (reviewed and confirmed in 2016); Section 4.

APPENDIX 2 - EXCLUSIONS FROM REQUIREMENTS

ISO/IEC 17021-1 Exclusions

The following sections of ISO/IEC 17021-1 are not required as part of this document:

1. Sections relating to surveillance audits; and

2. Sections relating to decisions on certification and issuance of certificates.

APPENDIX 3 - COMPETENCE AND AWARENESS FOR SEMS AUDITING AND AUDIT PROGRAM MANAGEMENT

The table below summarizes the minimum subject-matter areas with which personnel involved in SEMS auditing should have awareness or competence.

COMPETENCE AND AWARENESS FOR SEMS AUDITING AND AUDIT PROGRAM MANAGEMENT						
AREA	ACCREDITATION MANAGERS	SEMS AUDIT PLANNERS	AUDIT TEAM LEADS	AUDIT TEAM MEMBERS	SUBJECT-MATTER EXPERTS	AUDIT REPORT APPROVERS
Accreditation requirements (e.g., ISO/IEC 17021-1, COS Requirements and Guidance)	Competence	Awareness	Awareness	Awareness	NA	Awareness
Context of the industry and organization	Awareness	Competence	Competence	Competence	Competence	Competence
COS 2-Series SEMS auditing requirements documents	Competence	Competence	Competence	Awareness	NA	Competence
COS 1-Series guidance documents	Awareness	Competence of COS-1-06, -07, and -08; awareness balance	Competence	Awareness	NA	Competence of COS-1-07, and -08; awareness balance
IAF MD listed in Appendix 1A	Awareness	Competence	Awareness	Awareness	NA	Awareness
API RP 75†: SEMS terminology, application, principles, processes, and concepts	Competence	Competence	Competence	Competence	Awareness	Competence

APPENDIX 3 - (CONT)

COMPETENCE AND AWARENESS FOR SEMS AUDITING AND AUDIT PROGRAM MANAGEMENT						
AREA	ACCREDITATION MANAGERS	SEMS AUDIT PLANNERS	AUDIT TEAM LEADS	AUDIT TEAM MEMBERS	SUBJECT-MATTER EXPERTS	AUDIT REPORT APPROVERS
API RP 75[†]: elements	Awareness	Awareness	Awareness; competence of assigned elements	Awareness; competence of assigned elements	Awareness if applicable; competence if assigned for audit	Awareness
SEMS Auditing[‡]	Awareness	Competence	Competence	Competence	Awareness	Awareness
Management systems auditing coordination and leadership[‡]	Awareness	Awareness	Competence	Awareness	NA	Awareness
Documentation of SEMS audit findings and report production	Awareness	Awareness	Competence	Competence	Awareness	Competence
Identification and application of local requirements[a]	Awareness	Competence	Awareness if applicable; competence if assigned for auditing	Awareness if applicable; competence if assigned for auditing	Awareness if applicable; competence if assigned for audit	Awareness if applicable

[†] 3rd and/or 4th Edition as applicable to SEMS auditing program.

[‡] See Annex A in ISO/IEC 17021-1:2015.

[a] Examples of local requirements include but are not limited to regulatory requirements (e.g., U.S. Bureau of Safety and Environmental Enforcement 30 CFR Subpart S, State of Israel Ministry of Energy Petroleum Commissioner Guidelines), language, auditor required safety training (e.g., working at height, hydrogen sulfide respiratory, helicopter underwater escape), and auditor required individual documentation (e.g., TWIC, passport, visa).

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