Appendix 2 Guidance for managing, undertaking and reporting SHE Compliance Audits

To assure audits are conducted objectively they should be performed by trained and competent individuals, see Appendix 1 for training requirements, wherever possible independent of the activities being audited.

Where a team of auditors is required, one auditor should be nominated the Lead Auditor to initiate audit planning, co-ordinate the audit, co-ordinate the audit report write up and manage the audit's progress through line management to the agreement of audit actions.

In undertaking audits, auditors and specifically Lead Auditors should:

- Ensure that the scope of the audit is clearly defined by the audit programme: which SHE codes; which geographic or responsibility areas (Departments, sites etc) to be covered; and in what time period;
- Obtain information relevant to the audit planned, that may provide a focus for areas to be reviewed, this should include:
 - A copy of the code(s) to be audited;
 Note: the format and structure of the codes detailing responsibilities by role lends itself to structuring audit interviews;
 - the audit checklists relevant to the code(s) to be audited an appendix to each code in the SHE website. Good practise shows that audit checklists should be developed by auditors based on the code itself, the format of such can be found at the end of this appendix and can act as a helpful means to structure the audit process what questions and to whom to satisfy which aspect of the code being audited. Note: audit checklists should be used as a guide and should not become the ultimate focus of the audit process (a tick list);
 - for the area to be audited and the STFC in general SHE incidents related to the controls defined by the code(s) being audited;
 - where available the findings of previous audits of the area and the code(s) under consideration; and
 - o relevant pro forma documentation required for audit checklists, reports etc.
- Plan the audit to ensure that you understand who will need to be present (the 'auditees') and which areas will be visited;
- Where a team of auditors is required ensure that the team contains a balance of suitably qualified and experienced personnel appropriate for the scope and subject of the audit. Ensure that they have been trained, see Appendix 1. Ensure that the audit has sufficient priority in their work plans and that they have sufficient time available to conduct the audit and are sent relevant paperwork. A preparatory audit team meeting will be helpful to assign areas of responsibility/tasks for the audit and share information relevant to the audit including audit paperwork;
- Having identified 'auditees' ensure that they are aware of the audit and have made time in their diaries. An e-mail to the relevant Department Director for cascade is a useful means of raising auditee awareness prior to the audit. Where applicable, consider arranging opening and closing meetings with local management. While time consuming this aspect of planning an audit is critical to make effective use of auditor and auditee time;

Flexibility will be required to ensure that the audit programme does not clash with major and/or urgent operational activities;

- The objective of SHE Compliance auditing is to examine the *implementation of SHE Codes*, with the aim of improving their efficiency, and/or effectiveness in managing a particular SHE hazard - *"Are we following the codes, and can they be improved?"*. SHE Compliance audits should **NOT** in the first instance set out to review adequacy of the SHE code to meet current or anticipated SHE legislation this is the purpose of SHE System Audit that assess whether the management system meets STFC needs and legal requirements -*"Are we doing what we should be doing, is the system working as a whole - delivering STFC expectations?"*.
- In undertaking audits consider the following behaviours:
 - Polite and courteous you have a responsibility to maintain a professional relationship with auditees treating them with respect at all times - remembering that audits can be perceived as threatening by auditees and can result in very emotional responses. The purpose of the audit is to assess the process not the people;
 - Objective seeking verifiable evidence of compliance at all times;
 - Transparent ensure that all involved in the audit understand what you are doing, what you find and whether it meets code requirements no surprises;
 - Supportive once a concern is identified, consider with those involved how the requirements of the code could be satisfied efficiently and effectively so that pragmatic improvement suggestions can be made – try to leave solutions not just problems that consider relevant cost implications; and
 - Maintaining integrity the importance with which audit report findings will be considered by management depends to a significant degree on the integrity of those undertaking the audit.
- Employing an audit checklist against each question/prompt record who was audited and what was found and your conclusions as auditor – remember that you do not need to examine all examples of an activity – simply a sufficiently representative sample that gives you assurance that a responsibility is being enacted, ~5% level. Ensure that all conclusions are recorded and adequately supported and by reliable evidence – generally documented evidence; physical observation; or recorded verbal comment. This evidence should be sufficient for an experienced manager with no previous connection with the audit to ascertain what was found and how the conclusions were reached;
- Formally issue the finalised audit report to Department Directors for management consideration of the audit recommendations with a 1-month deadline, copied to SHE Group, Departmental Safety Contacts, Departmental Safety Committee Chairs and the STFC SHE Management Committee. Where recommendations are agreed management to detail the action required, the action owner and completion date for the action. Where a recommendation is rejected, management are required to document the basis for rejecting the recommendation.
- Record the audit report in Evotix Assure where the actions can also be set up to facilitate monitoring their completion. Evotix Assure will also allow standard progress reports for safety inspection actions to be set up.
- A template audit report can be found here.

Determining the frequency and scope of SHE Code audits

The audit plan attempts to audit approximately 42 safety Codes within a 5-year rolling programme. This equates to 8 audits per year over the 5-year period, whilst allowing for some flexibility each year to the scope of audits undertaken.

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Audits are undertaken mainly by the internal STFC SHE audit team, with additional support being provided by the UKRI Management Assurance Team (MAT) for generic lower-risk activity audits, and external professional consultants for the specialist technical SHE Code audits. Typically, the UKRI and consultant teams would undertake a total of 3 to 4 audits per year from the programme.

The frequency and scope of the SHE Code audits are determined by the following factors:

- The undertaking of an audit of a specific SHE code within a maximum 5-year timescale based on the last audit date or the initial issue date for any new SHE codes
- This 5 year timescale is further adjusted accordingly based on the previous overall audit report assessment

Overall assessment	Audit period
Substantial	6 to 7 years
Moderate	5 years
Limited	3 to 4 years
Unsatisfactory	1 to 2 years

• In addition, the scope of each audit is also determined by the previous overall audit report assessment;

Overall assessment	Scope
Substantial	Desk-top audit only
Moderate	General audit
Limited	Detailed audit including possible
	inspections
Unsatisfactory	Specific audit rigorously checking major
	actions from previous audit

The frequency of the audits would be further influenced by the following;

- Changes made to the SHE codes since the last audit was undertaken often need to embed into the department structures before they can be tested and this may extend the audit period accordingly. Likewise, some changes may require immediate implementation and these would need to be checked at an earlier date
- Changes in legislation impacting on the SHE codes requiring auditing by an earlier date
- STFC infrastructure changes at the various sites impacting on the SHE codes
- RIDDOR incidents requiring procedural updates and specific changes to the SHE codes
- National/International events which would prompt urgent audit requirements of specific SHE codes
- The findings of the annual STFC Risk Register, determining which of the top 10 SHE risks have not been audited in the past 4 years

Minimum requirements for the experience and qualifications of lead auditors

For each of the SHE Codes, there are agreed minimum requirements for the experience and qualification of the lead auditors responsible for the quality of the audit. This includes knowledge of the respective Codes and audit experience. All audit reports should confirm how these requirements are met.

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SC01 Lone Working SC02 Safe movement of vehicles	Technical knowledge - Risk assessment training - Lone working awareness training – Totara - Awareness of lone working alarm system - Risk assessment training - Awareness of the site vehicle transport risk assessment - Awareness of the Highway	 SHE Advisor Experience of lone working planning Knowledge of previous audit report or experience as part of the audit team SHE Advisor/Estates team Experience of site traffic
SC02 Safe movement of vehicles	 Lone working awareness training – Totara Awareness of lone working alarm system Risk assessment training Awareness of the site vehicle transport risk assessment 	 planning Knowledge of previous audit report or experience as part of the audit team SHE Advisor/Estates team
/ehicles	 Awareness of lone working alarm system Risk assessment training Awareness of the site vehicle transport risk assessment 	 Knowledge of previous audit report or experience as part of the audit team SHE Advisor/Estates team
/ehicles	 alarm system Risk assessment training Awareness of the site vehicle transport risk assessment 	report or experience as part of the audit team - SHE Advisor/Estates team
/ehicles	 Risk assessment training Awareness of the site vehicle transport risk assessment 	the audit team - SHE Advisor/Estates team
/ehicles	- Awareness of the site vehicle transport risk assessment	the audit team - SHE Advisor/Estates team
/ehicles	- Awareness of the site vehicle transport risk assessment	
	transport risk assessment	- Experience of site traffic
	-	Experience of she traffic
	- Awareness of the Highway	management
		- Knowledge of previous audit
1002 0 0 0	Code	report or experience as part of
		the audit team
SC03 Safe use of cryogenic	- Safe use of cryogenic	- SHE Advisor/Engineering
naterials	equipment training	background
	- Awareness of cryogenic	- Experience of cryogenic
	hazard information	management
	- Awareness of oxygen level	- Knowledge of previous audit
	monitors	report or experience as part of
		the audit team
SC04 PUWER	- PPE, ladder use, scaffold	- SHE Advisor/Engineering
	awareness, LEV, abrasive	background
	wheels, FLT training	- Experience of hand tool and
	- General awareness of	machinery use and managemen
	machinery user information	- Knowledge of previous audit
	- Awareness of vibrating	report or experience as part of
	equipment and HAV	the audit team
SC05 Incident reporting and	- Awareness of the incident	- SHE Advisor/Technical
nvestigation	investigation process	background
8	- Awareness of RIDDOR and	- Experience of incident
	SoPS process	investigation
	- Awareness of incident	- Knowledge of previous audit
	reporting process	report or experience as part of
	reporting process	the audit team
SC06 Risk management	- Awareness of the STFC risk	- SHE Advisor/Technical
SCOO Kisk management	assessment process	background
	- Awareness of hazard	- Experience of risk assessment
	identification	preparation
	- Awareness of method	- Knowledge of previous audit
	statement process	report or experience as part of the audit team
SC07 SHE Improvement	- Awareness of the STFC SHE	
SC07 SHE Improvement		- SHE Advisor/Third party bod
blanning	Improvement planning process	- Experience of the STFC SHE
	- Awareness of department SHE	Improvement plan preparation
	Improvement planning process - Awareness of the review and	- Knowledge of previous audit
		report or experience as part of the audit team
	monitoring process in the	
	delivery of the STFC SHE	
SC08 Travel on Council	Improvement plans	- SHE Advisor/Estates team
	- Awareness of the STFC travel	
pusiness	policy and controls	- Experience of the STFC trave
	- Awareness of the preparation	plan preparation
	of travel plans and itineraries	- Knowledge of previous audit
	- Awareness of the FCO travel	report or experience as part of
	risk process	the audit team
SC09 Working at height	- Awareness of the STFC	- SHE Advisor/Estates
	working at height policy and	team/Technical background
	controls	- Experience of the preparation
	- Awareness of the STFC	of working at height risk

	working on roofs process	assessments
	- Awareness of the emergency	- Knowledge of previous audit
	and rescue requirements for	report or experience as part of
	working at height	the audit team
SC10 SHE Training	- Awareness of the STFC SHE	- SHE Advisor/Third party body
	induction and refresher training	- Experience of the preparation
	process	of a training needs analysis
	- Awareness of the STFC SHE	- Knowledge of previous audit
	mandatory training process - Awareness of the hazard	report or experience as part of the audit team
	specific STFC SHE training	
	process	
SC11 Work in confined spaces	- Awareness of the STFC	- SHE Advisor/Estates
1	working in confined spaces	team/Technical background
	policy and controls	- Experience of the preparation
	- Awareness of the STFC permit	of working in confined spaces
	to work in confined space	risk assessments
	process	- Knowledge of previous audit
	- Awareness of the emergency	report or experience as part of
	and rescue requirements for	the audit team
SC12 Manual handling	working in confined spaces - Awareness of the STFC	- SHE Advisor/Technical
5012 Ivianuar nahunng	manual handling policy and	background
	controls	- Experience of the preparation
	- Awareness of the identification	of manual handling risk
	of manual handling hazards	assessments
	- Awareness of the preparation	- Knowledge of previous audit
	of manual handling risk	report or experience as part of
	assessments	the audit team
SC13 CDM	- Awareness of the STFC CDM	- SHE Advisor/Estates
	policy and controls	team/Technical background
	- Awareness of the duty holder	- Experience of the undertaking
	roles required for CDM projects - Awareness of the notifiable	of CDM projects
	project criteria and the process	- Knowledge of previous audit report or experience as part of
	of notifying the HSE	the audit team
SC14 Radioactive sealed	- Awareness of the STFC	- SHE Advisor/Radiation safety
sources	management of radioactive	team
	sealed sources policy and	- Experience of the local rules
	controls	associated with the use of
	- Awareness of the RPA and	radioactive sealed sources
	RPS roles and their duties	- Knowledge of previous audit
	- Awareness of the annual	report or experience as part of
SC15 Management of	source audit process - Awareness of the STFC	the audit team - SHE Advisor/Estates team
solis Management of	- Awareness of the STFC management of contractors	- SHE Advisor/Estates team - Experience of managing
contractors	policy and controls	contractors
	- Awareness of the SLC and	- Knowledge of previous audit
	CSO roles and their duties	report or experience as part of
	- Awareness of the STFC SHE	the audit team
	information for contractors and	
	the preparation of RAMS	
SC16 Biological safety	- Awareness of the STFC	- SHE Advisor/Biological safety
	biological safety policy and	officer/ Third party body
	controls	- Experience of the preparation
	- Awareness of the biological	of biological risk assessments
	safety officer role and duties - Awareness of the STFC	- Knowledge of previous audit
	biological safety committees	report or experience as part of the audit team
	and their scope	
SC17 Testing and inspection of	- Awareness of the STFC PAT	- SHE Advisor/Electrical
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electrical equipmenttesting policy and controls - Awareness of the PAT tester and PLO roles and their duties - Awareness of the classification of electrical equipmentengineer/Estates team/Third party body - Experience of the inspection and testing programme for Schedule A and B electrical equipment - Knowledge of previous audit report or experience as part of the audit teamSC18 Control of noise at work- Awareness of the STFC control of noise at work- STFC control of noise at work policy- SHE Advisor/Technical background/Estates team	
of electrical equipment Schedule A and B electrical equipment equipment - Knowledge of previous audit report or experience as part of the audit team SC18 Control of noise at work - Awareness of the STFC - SHE Advisor/Technical	
SC18 Control of noise at work - Awareness of the STFC - SHE Advisor/Technical	
SC18 Control of noise at work - Awareness of the STFC - SHE Advisor/Technical	
and controls - Experience of noise hazard - Awareness of noise action identification and assessment	
values - Knowledge of previous audit - Awareness of the noise report or experience as part of	
- Awareness of the noise report or experience as part of assessment process and the provision of health surveillance	
SC19 Work on buildings - Awareness of the STFC work - SHE Advisor/Technical	
on buildings policy and controlsbackground/Estates team- Awareness of building work- Experience of buildings,	
co-ordinator role and duties premises, services and - Awareness of the change of infrastructure projects	
- Awareness of the change of infrastructure projects use process and subsequent - Knowledge of previous audit	
hazard identification report or experience as part of the audit team	
SC20 DSEAR - Awareness of the STFC - SHE Advisor/Mechanical	
controlling explosive and flammable gases and dusts policy and controlsengineer/Third party body - Experience of the preparation of DSEAR risk assessments	ı
- Awareness of hazard area - Knowledge of previous audit	
classifications report or experience as part of - Awareness of the ATEX the audit team	
- Awareness of the ATEX the audit team requirements	
SC21 Radioactive waste - Awareness of the STFC - SHE Advisor/Radiation safet	y
radioactive waste policy and team controls - Experience of the STFC	
- Awareness of the RPA, RWA, radioactive waste disposal	
RWM and RMC roles and theirprocessduties- Knowledge of previous audit	
- Awareness of the annual report or experience as part of radioactive waste material audits the audit team	
process	
SC22 Working with lasers- Awareness of the STFC working with lasers policy and- SHE Advisor/Third party body - Experience of the preparation	-
controls and the roles of overall of laser risk assessments and the	ne
laser responsible officer, laserimplementation of controlresponsible officer and lasermeasures	
nominated person, and their - Knowledge of previous audit	
dutiesreport or experience as part of- Awareness of laser exposurethe audit team	
limit values and health	
surveillance requirements	
- Awareness of the identification of laser hazards and the	
designation of laser areas	
SC23 Working with time- varying EMFs- Awareness of the STFC working with time-varying- SHE Advisor/Third party box - Experience of the preparation	
EMFs policy and controls of specific EMF risk	
- Awareness of the role of EMF assessments and the protection advisors and their implementation of control	
protection advisors and their 1 implementation of control	
duties measures	

	- Awareness of the EMF	- Knowledge of previous audit
	exposure limit values	report or experience as part of the audit team
SC24 Occupational health screening and surveillance	 Awareness of the STFC occupational health screening and surveillance policy and controls Awareness of the site specific occupational health provision of health screening and surveillance Awareness of the role of appointed doctor and their duties 	 SHE Advisor/Third party body Experience of the preparation of PPQs for new members of staff Knowledge of previous audit report or experience as part of the audit team
SC25 DSE	 Awareness of the STFC DSE policy and controls Awareness of the requirements of DSE assessments and the subsequent implementation of controls Awareness of the DSE training provision 	 SHE Advisor/Technical background Experience of the preparation of DSE assessments Knowledge of previous audit report or experience as part of the audit team
SC26 Lifting equipment and lifting accessories	 Awareness of the STFC lifting equipment and lifting accessories policy and controls Awareness of the roles of LOLER manager and LLOs and their duties Awareness of the requirements for the purchase, design and use of LELA 	 SHE Advisor/Mechanical engineer Experience of the preparation of lifting plans for complex lifts Knowledge of previous audit report or experience as part of the audit team
SC27 Receipt and dispatch of hazardous substances	 Awareness of the STFC receipt and dispatch of hazardous substances policy and controls Awareness of the roles of RPA, radioactive substance dispatchers and DGSA, and their duties Awareness of the dangerous goods packaging requirements 	 SHE Advisor/Third party body Experience of the preparation of hazard assessments of materials with no MSDS Knowledge of previous audit report or experience as part of the audit team
SC28 Radioactive open sources	 Awareness of the STFC radioactive open sources policy and controls Awareness of the RPA, RPS, and Health physics group roles and their duties Awareness of the radioactive open source accounting process 	 SHE Advisor/Radiation safety team Experience of the receipt and dispatch of radioactive open sources Knowledge of previous audit report or experience as part of the audit team
SC29 Management of ionising radiation at work	 Awareness of the STFC management of ionising radiation at work policy and controls Awareness of the RPS, RPA, RWA and Health physics group roles and their duties Awareness of the site radiation emergency response process 	 SHE Advisor/Radiation safety team Experience of the preparation of radiation risk assessments Knowledge of previous audit report or experience as part of the audit team
SC30 SHE Auditing and inspection	- Awareness of the STFC SHE auditing and inspection policy	- SHE Advisor/Third party body - Experience in the identification of SHE
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	- Awareness of the requirements for SHE compliance audits,	improvement opportunities - Knowledge of previous audit
	SHE system audits and SHE	report or experience as part of
	inspection tours	the audit team
	- Awareness of identifying SHE	
	non-conformance	
SC31 Controlled and hazardous	- Awareness of the STFC	- SHE Advisor/Technical
waste	controlled and hazardous waste	background/third party body
	policy and controls	- Experience in the packaging
	- Awareness of the roles of STFC environment officer and	and labelling of waste being
	waste disposal officer and their	transferred for disposal - Knowledge of previous audit
	duties	report or experience as part of
	- Awareness of the requirements	the audit team
	of hazardous waste consignment	
	notes	
SC32 Fire and emergency	- Awareness of the STFC fire	- SHE Advisor/Technical
management	and emergency management	background/FSA
	policy and controls - Awareness of the roles of	- Experience in the preparation of fire risk assessments
	building fire managers, building	- Knowledge of previous audit
	wardens, fire safety advisors and	report or experience as part of
	hot work permit issuers and	the audit team
	their duties	
	- Awareness of the requirements	
SC22 Sofaty of processing and	of PEEPs - Awareness of the STFC safety	- SHE Advisor/Mechanical
SC33 Safety of pressure and vacuum systems	of pressure and vacuum systems	engineer
vacuum systems	policy and controls	- Experience in the design or use
	- Awareness of the roles of	of pressure and vacuum systems
	pressure/vacuum systems design	- Knowledge of previous audit
	engineer, nominated engineer,	report or experience as part of
	technicians and permit issuers	the audit team
	and their duties - Awareness of the requirements	
	of the fitting protective devices	
	to pressure and vacuum systems	
	and the preparation of WSE	
SC34 Electrical safety	- Awareness of the STFC	- SHE Advisor/Electrical
	electrical safety policy and	engineer
	controls - Awareness of the roles of	- Experience in hazard identification of electrical work
	electrical authorising engineer,	- Knowledge of previous audit
	authorising person and	report or experience as part of
	nominated person and their	the audit team
	duties	
	- Awareness of the requirements	
	of electrical distribution system	
SC35 Asbestos management	safety rules and procedures - Awareness of the STFC	- SHE Advisor/Estates
5055 Asocstos management	asbestos management policy	team/third party body
	and controls	- Experience in the preparation
	- Awareness of the site asbestos	of risk assessments for work
	register and associated asbestos	where there is a likely exposure
	permits to work	to asbestos
	- Awareness of the roles of building works coordinators and	- Knowledge of previous audit report or experience as part of
	asbestos control officer and their	the audit team
	duties	ne autor tourn
SC36 First aid management	- Awareness of the STFC first	- SHE Advisor/third party body
	aid management policy and	- Experience in the preparation
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	controls - Awareness of the training requirements of site first aiders and specific treatment requirements for cryogenic and hydrofluoric acid burns - Awareness of the role of occupational health teams, first aiders and contract supervising officers and their duties	of assessments of first aid needs in the workplace - Knowledge of previous audit report or experience as part of the audit team
SC37 COSHH	 Awareness of the STFC COSHH policy and controls Awareness of the role of COSHH assessor and contract supervising officers and their duties Awareness of the general principles for working with hazardous substances 	 SHE Advisor/technical background Experience in the preparation of COSHH risk assessments Knowledge of previous audit report or experience as part of the audit team
SC38 Control of legionella	 Awareness of the STFC control of legionella policy and controls Awareness of the role of legionella responsible person and the site water safety groups and their duties Awareness of the requirements of emergency actions in the event of an outbreak of legionella 	 SHE Advisor/technical background/Estates team/Third party body Experience in the preparation of legionella risk assessments and water system registers Knowledge of previous audit report or experience as part of the audit team
SC39 Static magnetic fields	 Awareness of the STFC static magnetic fields policy and controls Awareness of the role of static magnetic field protection advisers and occupational health advisors and their duties Awareness of the exposure limit values and action levels 	 SHE Advisor/technical background Experience in the hazard identification associated with strong static magnetic fields and the preparation of specific EMF assessments Knowledge of previous audit report or experience as part of the audit team
SC41 Controlling pollution to air, land and water	 Awareness of the STFC controlling pollution to air, land and water policy and controls Awareness of the authorisations required to carry out discharges and the production of hazardous waste Awareness of the annual review of the environmental legal compliance registers 	 SHE Advisor/technical background/third party body Experience in the preparation of the register of legal requirements and environmental aspects and impacts Knowledge of previous audit report or experience as part of the audit team

Minimum requirements for auditor independence

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Auditors undertaking SHE compliance audits should have a level of impartiality in their duties in order to address the risks associated with creating biased results. Any conflict of interest, self-interest, self-review, advocacy, intimidation or familiarity with the Departments and processes being audited needs to be reconciled. All auditors should be provided with the freedom from influences that might affect impartiality, including those that could arise from undue pressures or inducements, conflict of interest, and personal, financial, or other non-professional considerations.

It is important that auditors provide specialist support for technical audits, affording their training, knowledge and experience of the subject matter, but need to be fully aware that in doing so they uphold the principles of the absence of bias in their contributions.

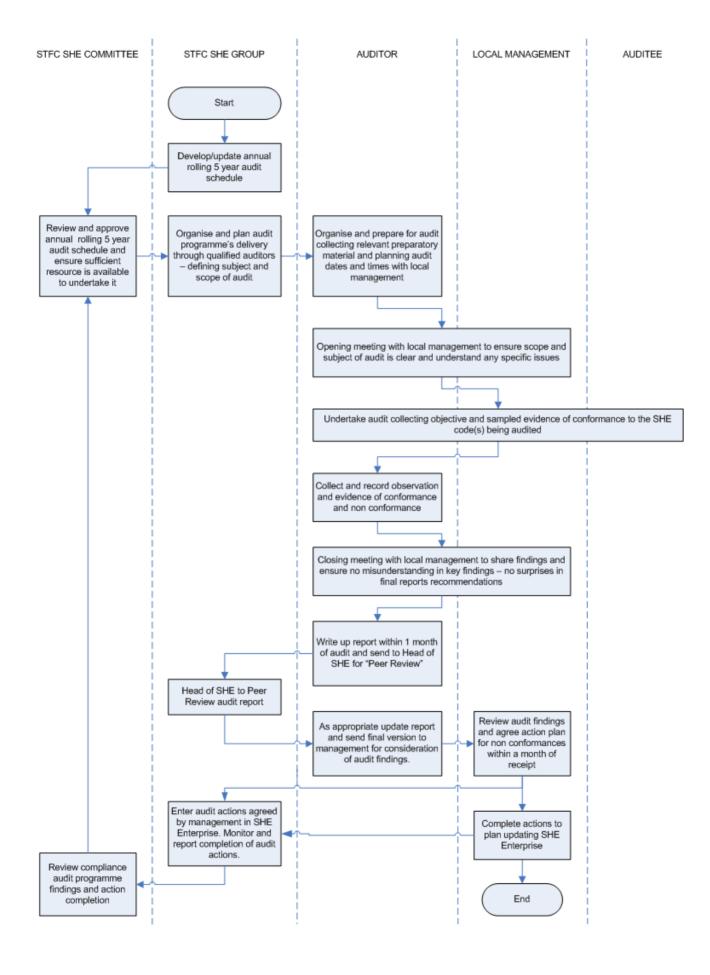
Checks should be made at the outset of an audit to ensure that auditor impartiality has been addressed and recorded in each audit report.

Minimum requirements for the peer review of audit reports prior to publication

Prior to publication, audit reports should be peer reviewed by the SHE audit manager and/or the head of SHE Group. The review ensures that the scope coverage has been met, that the content of the audit against the annual audit programme has been evaluated and that standards of evidence are consistent throughout the report. This peer review should be recorded in the audit reports.

A summary flowchart of the audit process is shown below

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Suggested prompts for auditors undertaking audits

Audit interview checklist

- Introduce yourself explain objectives of the audit programme senior management assurance and code improvement and what code you are auditing.
- Thank them for sparing the time to be audited.
- Remind them that the process is being assessed NOT the people never compare people or judge them.
- Remind auditees that everything is confidential, but you will be taking some written notes to write up a report and that the report will go to the STFC H&S Consultation Committee and local management.
- Use checklist to keep interview on track
- Use question types appropriately open questions to seek information, closed questions to clarify your understanding avoid leading questions.
- Summarise your conclusions to ensure no surprises. Don't engage in gossip, argue or be confrontational - remain professional.

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