

SEBASE Audit Submission for Worker-less Companies

Outline for a company's SEBASE audit submission where the company has no direct employees and only employs sub-contractors and/or Prime Contractors.

Definitions:	
Company	The company, band, corporation, cooperative, limited partnership or other economic entity (or part thereof) seeking certification.
Forestry Group	The small number of individuals in a larger company who are specialized in management of forestry issues when no other members of the company would have any significant operational knowledge. <i>The forestry group may be a single person within a larger company.</i>
Monthly Oversight inspection	An impartial inspection of the forestry operations for which the company is receiving economic benefit from the harvesting of trees. This must be performed by a 3 rd party with no conflict-of-interest with the contractors being inspected or by members of the company or forestry group. <i>The third party may be an OH&S specialist or a more generalized contractor. If performed by a 3rd party, the results must be communicated to and discussed by the company or forestry group.</i>
Single-person entity	<i>The case where the company consists of only one person who hires Prime Contractors to manage the forestry operations.</i>

The preferred submission style is a binder with 31 tabs (using a commercially-available 31-tab set for days-of-month is recommended, with question C-5 not requiring a tab since it has no data to submit and question A-2 occurring in a preface/cover letter/preamble to the audit package.) The data for each question is then inserted into the corresponding tab, helping to ensure that the authors complete every question with sufficient, but not excess, information as well as clarifying the review and feedback process.

Since this method will apply to several audit submission, the audit preamble should contain a clear description of the company and of the audit preparer along with information mentioned in the following table under A-2.

The following data sets are intended as clear descriptions of the type of data to submit and assume that the company has positive data of the type recommended in order to satisfy the question. This list is intended as guidance on how to satisfy the published SEBASE audit requirements, not a replacement for those requirements. The recommended methods have applied and/or would apply to any economic entity or part thereof having similarly structured operations that is seeking certification and are not unique to First Nations.

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Question	Recommended Method
	Element A
A-1	Submit company safety policy statement. Having this 1-page document signed by a company official and dated is highly recommended. This safety policy might be the policy applicable to the entire band or just to the forestry-related group and needs to specifically include contractors in its scope.
A-2	Submit a paragraph to page explaining the structure of the economic entity (or part thereof) and provide names, positions and contact information for individuals in the economic entity who are involved with forestry operations. Provide a list of current (forestry) contractor companies with contact person and information and a brief description of their scope of work for the company. If there are no current contractors, provide recent past contractors.
A-3	Submit copies of monthly oversight inspections of contractor operations that include observations of the contractor's workers. At least one worker observation per month is required in the data sample for each month that contractor operations are occurring.
A-4	Submit internal meeting minutes from the company where company and industry safety alerts are discussed. Depending on the structure and function of the company, these might be meetings of the band administration as a whole or just meetings of a forestry-related group. <i>If the company is a single person entity, then minutes of group meetings with Prime are appropriate substitutes.</i>
A-5	Submit copies of monthly oversight inspection reports, at least one per month. Note that since copies of the monthly oversight inspections satisfy many questions, submit them once in A-3 and reference them in the other tabs of the submission binder rather than submitting multiple copies. Highlighting different portions of the reports for their different content requirements for different questions is a possible option. Note that oversight inspections may be performed by any competent party that is not in a conflict-of-interest position with the contractor being inspected. The oversight inspections do not have to be performed by company staff, but may be performed by specific contractors (i.e. management companies). It is highly recommended for due diligence purposes that at least one oversight inspection per year be performed by a member of the company instead of or along with any inspection contractor/management company representative.
A-6	Submit internal company (or forestry group within the company) meeting minutes from the company showing that the Accord is discussed. Note that since copies of the monthly minutes satisfy many questions submit them once in A-4 and reference them in the other tabs of the submission binder rather than submitting multiple copies. Highlighting different business items of the minutes for the different content requirements of various questions is a possible option. <i>If the company is a single person entity, then minutes of group meetings with Prime are appropriate substitutes.</i>

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Element B	
B-1	Submit copies of pre-work planning that either occurs internally within the company or forestry group or with contractor participation with the company or forestry group, with the data size being at least one pre-work for the current contract up to one pre-work per month if there are many contracts.
B-2	Submit monthly oversight inspections as in A-3. At least one inspection per operating month is required. If there are non-operating months, please state this. Please do not submit more than 3 inspections per month even if there are more than 3 simultaneous contractors working for the company in order to keep a manageable report size. The pre-work planning meeting can count as a monthly inspection if it occurs at the site of work.
B-3	<p>If the company (or forestry group within the company) has its own pickup trucks or vehicles used to access sites, submit maintenance records for them. The data size should be 2, 1-week runs of daily operator pre-shift inspections, selected non-randomly to include an interesting event (breakdown, repair needed, repair completed, etc.) and include a photocopy of any associated repair work (invoice, company shop log, etc.).</p> <p>Regardless of the prior paragraph, also submit 2, 1-week runs of daily operator inspections, selected and supported in a similar manner, for any 2 pieces of each contractor's equipment (the company has an obligation to ensure the maintenance of contractor equipment, so contractors can be required to provide this, although financial information could be redacted). This inspection should be performed by the contractor, not the company.</p>
B-4	Submit company (or forestry group within the company) SOP's, particularly related to how company members oversee forestry operations. If the company uses a third party management company to oversee operations, then submit the SOP's that describe how the company oversees the management company AND the SOP's that describe how the management company is to oversee the forestry operations.
Element C	
C-1	Company (or forestry group within the company) PPE policy is to be submitted.
C-2	Submit information in B-4, plus submit standard minimum requirements for all contractors to follow for their operational SOP's (or JSA, JSB, work instruction, etc.). This is at least a company requirement for its contractors to have written work instructions but may also include minimum content requirements for work instructions if the company wishes.
C-3	Submit the discipline policy as it applies to contractors, referencing both actions by individual contractor workers and by contracting companies as entities.

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C-4	<p>Submit the ERP that covers</p> <ul style="list-style-type: none"> • Injuries • Fires • Fatalities • Natural disasters applicable to the geography • Any other scenarios of interest to the company <p>For the 2 settings of</p> <ul style="list-style-type: none"> • Company offices • Field operations performed by contractors.
C-5	<p>This is an interview question using phone information in A-2, so no data is required to be submitted.</p>
C-6	<p>Submit the company Injury Management program applicable to its own staff. This would apply across an entire company, not just a forestry group, as injury management is a province-wide concept.</p> <p>If the company is a single-person entity, then submit the portion of the company safety program that requires contractors to have an Injury Management Program.</p>
Element D	
D-1	<p>Submit the contractor orientation requirements, specifically including a requirement to re-orient any contractor absent for more than 6 weeks</p> <p>Also submit the company new worker orientation requirements, applicable to all workers in all areas of the company. All workers in all areas are subject to WSBC New Worker Orientation requirements, so the requirements are not limited to the forestry group of a company. This second paragraph is not applicable to single-person entities.</p>
D-2	<p>Submit the contractor and worker orientation checklist(s) that specifically includes the following 7 items</p> <ul style="list-style-type: none"> • Company policy • Hazards of the worksite • SOP's • Right to refuse unsafe work • Reporting injuries and close calls • ERP • Discipline <p>It is highly recommended that the company's form(s) meet the WSBC New Worker Orientation requirements as well. If the company is a single-person entity, then only submit the contractor orientation.</p>
D-3	<p>Submit company certificates from the forestry group, such as driver's licenses, plus a small sample of contractor's employees' certificates, such as WHMIS, Class I driver, 1st aid certificates, faller's certificates or any other specialized certificate. A good data size is to submit one certificate of each type required in the operations.</p>

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D-4	Submit the company's internal new worker training and assessment protocol. Since the WSBC Regulation applies to all industries, the company needs to have a new worker training protocol for non-forestry jobs as well. If the company is a single-person entity, submit contractor documentation showing that new workers are (or would be if there are no new workers) assessed.
Element E	
E-1	Submit one set of company monthly safety meeting minutes for each month in the scope of the audit. Meetings do not necessarily have to be purely safety meetings, and may be multi-purpose meetings that include safety content such as oversight inspection results. Non-safety content may be redacted for confidentiality. These meetings may be of the company as a whole or only of the forestry group, depending on the structure and function of the company and the company's wishes If the company is a single-person entity, then submit minutes from meetings with Primes and/or contractors.
E-2	Submit the company close call policy that requires <ul style="list-style-type: none"> • Company members (all, not just forestry) to report close calls, unless company is a single-person entity • Contractors to report close calls
E-3	Submit monthly company or forestry group safety meeting minutes showing that close calls were discussed. If no close calls were present to be discussed, show this as a null item on a standing agenda. If the company is a single-person entity, then minutes will be from company to contractor meetings
E-4	Submit any informal communication method showing safety items are discussed outside of meetings. This could be e-mails, memos, notes or any other method at the company's disposal.
Element F	
F-1	Submit the injury reporting policy that requires company members to report injuries to the company and Contractors to report injuries to the company.
F-2	Submit 2 investigation reports, using reports from contractors if there were no company events. If there were no contractor events, also submit the investigation procedure and blank form. The events might be the close calls in E-2.
F-3	Submit the commitment to issue an industry alert for events of significant learning that occur on company forestry operations and submit the corrective actions for the investigations included in F-2 and/or E-2.
Element G	
G-1	Submit the contractor selection criteria, specifically including SAFE-certification (by a date of the company's choosing). Note that IOO's (individual owner-operators) can now be certified so should no longer be exempted from this.

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G-2	<p>If the contractor is a SEBASE-sized company, then management-to-management meetings are required on at least an annual basis. Please include the minutes from these with the audit submission.</p> <p>If the contractor is an individual owner-operator, they may be assessed using the regular worker process in A-3. Please include these with the audit submission, clearly marking that the worker is a contractor.</p> <p>If the assessments in A-3 include feedback to the contractor company built into the assessment/inspection forms, this would also be positive evidence.</p>
Element H	
H-1	Please submit Prime Contractor selection criteria, specifically including an assessment of the ability to perform the duties of a Prime Contractor and also specifically including SAFE-certification (by a date of the company's choosing).
H-2	Submit monthly oversight inspections of Prime Contractors. Suggested items for inclusion on the "Prime Contractor Inspection Checklist" are location and stocking of ETV, First Aid Attendant, known hazards identified, Supervisory capacity, other employers on site aware of available First Aid, identification of the Prime Contractor's site Health and Safety Rep, worker performance observations, communication channels and identified safety hazards as a minimum.
H-3	Submit 2 Prime Contractor agreements. Financial and non-safety information is not required and may be redacted. Signatures and dates are required. If there was only 1 Prime Contractor agreement in the company's scope, please submit this and state that there is only 1 agreement.
H-4	Submit communications showing that the company (or forestry group) has required contractors to correct deficiencies that were either discovered by the company or by the contractor. The deficiencies may be the responsibility of the contractor or of that contractor's sub-contractors. The deficiencies could be discovered during monthly inspections or reported by any other means. Typical tracking methods are use of a CAL and/or meeting minutes.