F. No. 51013/1/2020-MPS
Government of India
Ministry of Coal
[MPS Section]
*****

Room No. 622-A, Shastri Bhawan
New Delhi, Dated   December, 2023

ORDER

Subject: Implementation of Guidelines on "Safety and Health Management System Audit" in Coal and Lignite Mines – reg.

The undersigned is directed to convey the decision of the Government for implementing guidelines on "Safety and Health Management System Audit" in Coal and Lignite Mines. Copy of the guidelines on "Safety and Health Management System Audit" in Coal Mines is enclosed.

2.   All coal companies/mine owners are hereby directed to strictly adhere to the guidelines. Safety auditing on annual basis is mandatory and all coal companies/mine owners will have to submit audit report to CCO by end of March every year. Coal companies/mine owners can hire external auditor. UGC approved agencies will impart training to auditors. Time-frame for completion of audit will be mentioned while assigning the work.

This issues with the approval of the Competent Authority.

ENCL: As above

(Sanjeev Ranjan)
Under Secretary to the Govt. of India
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To

1. The Chairman, CIL,
2. The CMD, SCCL,
3. The CMD, NLCIL,
4. The CMDs of All CIL Subsidiaries

Copy to :

1. Director (T) NA - with the request to circulate these guidelines to owners of captive/commercial mines for necessary compliance.
2. Sr. Technical Director (NIC), MoC - with the request to publish on the website of Ministry of Coal.

Safety and Health Management System Audit

1. INTRODUCTION

Ministry of Coal Govt. of India has constituted a High-Level Expert Committee on Safety Vide its Notification No.MPS-51013/1/2020-MP dated 1st Jan 2021 which was subsequently modified on 9th May 2021. The terms of Reference of this committee were set to improve the safety conditions of the Coal Mines. The committee in its meeting on 11/05/21 suggested that there should be a system of regular auditing of the Health and Safety management system apart from the traditional safety auditing of the mines done by various coal companies. This was proposed as a Short-term action plan and the same was accepted by the MOC. To prepare a comprehensive note the Committee has, since then, discussed and deliberated the subject with all large coal-producing companies and has taken note of their views. The Committee during the field visits has also tried to assess the efficacy of such exercises.

2. BACKGROUND

Coal Mines Regulation 2017 has provided for the preparation of a Safety Management Plan (SMP) based on Risk Assessment by the management, reviewing it periodically. The SMP shall contain ways to measure, monitor and evaluate the performance of the Safety and Health Management System of each mine and correct matters that do not conform to the SMP. Now the focus of the safety management system is system driven instead of individual-driven and based on the principles of risk management instead of compliance-oriented, that is, identify hazards and assess risk and implement controls to ensure risk is at an acceptable level and as low as reasonably achievable (ALARA).

Presently the implementation of the SHMS in the mines is far from satisfactory. It has been observed that, by and large, the mines have adopted risk assessment as a tool for developing the SMP. However, the experience to date has revealed that, in most cases, the philosophy of a risk-based safety management system has not been properly understood or absorbed in the system, thereby resulting in nothing but the creation of another set of documents like the statutory rule books rather than the adequate and effective implementation of the SMP. Hence, the basic purpose of shifting the philosophy from a rule-based to a risk-based safety management system has not been accomplished over the last two decades since the inception of the subject or concept during 1999-2000 through the 9th National Conference on Safety in Mines.

One of the reasons for the ineffective implementation of the present system of risk-based safety management in Indian coal mines is the lack of suitable mechanisms or processes for auditing the SMPs at regular intervals. In view of the above, the committee suggests that a system of regular auditing shall be adopted by the mine management for effective implementation of the Safety and Health Management system. The auditing shall be done by qualified auditors who are experienced in SHMS having domain knowledge and experience.

3. **Extracts of relevant Statutes on National or International Standards requiring the introduction of an Audit of Safety and Health Management Systems in mines for improvement of safety performance**

The relevant extracts from different statutes / national/international standards on the requirement of safety audit are given below for ready reference:

3.1. **ILO OHS-2001**

India is a founder member of the International Labour Organization since1919, which is the only tripartite U.N. agency that brings together governments, employers and workers of 187 Member states to set labour standards, develop policies and devise programmes promoting decent work for all women and men.

ILO OHS-2001 provides for audits under para 3.13, as under:

3.13.1. Arrangements to conduct periodic audits are to established to determine whether the OSH management system and its elements are in place, adequate, and effective in protecting the safety and health of workers and preventing incidents.

3.13.2. An audit policy and programme should be developed, which includes a designation of auditor competency, the audit scope, the frequency of audits, audit methodology and reporting.

3.13.3. The audit includes an evaluation of the organization's OSH management system elements or a subset of these, as appropriate.

3.2. **ISO 45001:2018**

ISO 45001:2018 is the International Standard on Occupational Health and Safety Management Systems - Requirements with Guidance for use in its para 9.2 emphasising internal audit at planned intervals to provide information on whether the OH&S management system conforms to the organisation's requirement for its OH&S Management system, including the OH&S policy and OH&S objectives and its effective maintenance. The details of auditing are mentioned in ISO 19011:2018.

3.3. **The Indian Standard IS 14489:1018 (Occupational Health and Safety Audit - Code of Practice)**

The IS 14489:1018 establishes audit objectives, criteria and practices and provides for establishing, planning, conducting and documenting observations of audit(s) on the OH&S system at the workplace. It provides guidelines for evaluating the effectiveness of the Health and Safety Program, verifying the availability and implementation of elements of the OH&S system, and the system's ability to achieve the defined safety objectives. This standard focuses on the modality of OH&S audit to be carried out in various industries including major Accident Hazard Industries. It is also emphasised that this standard can be used as a guideline for self-demonstration of the Conformation of IS/ISO 45001.

3.4. **OSH&W Code, 2020**

The Government of India notified, the Health and Working Conditions Code, 2020 [28th September 2020.], an Act to consolidate and amend the laws regulating the occupational

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safety, health and working conditions of the persons employed in an establishment and for matters connected therewith or incidental thereto.

This code amalgamated many acts, including The Factories Act of 1948, The Mines Act of 1952, and The Contract Labour (Regulation and Abolition) Act 1970.

The Code provides for hazard evaluation procedures like safety audit [18.(2)(a)v], hazard and operability studies, etc. and also calls for information, inspection and survey.

3.5. Coal Mines Regulation, 2017 and DGMS Circulars

3.5.1. Regulation 104

(3) Based on the identified hazards and risks, the owner, agent and manager of every mine shall prepare an auditable document called "Safety Management Plan", that forms part of the overall management and includes organisational structure, planning, activities, responsibilities, practices, procedures, processes and resources for developing, implementing, achieving, reviewing and maintaining a safety and health policy of a company.

The owner, agent and manager of every mine shall periodically review the hazards identified and risks assessed, to determine whether further elimination, control and minimising of risk is possible and consult with the safety committee on review.

3.6. DGMS Technical Circular No. 3 of 2019

DGMS in its Technical Circular No. 3 of 2019 on Guidelines for the implementation of Safety Management Plan (SMP) in mines has stressed on Auditable mode of SMP. The audit can be taken up initially by ISO of the company and after a satisfactory internal audit, an external audit may be carried out as deemed fit by the management. On satisfactory completion of the audit, the SMP may be classified as having completed the complete cycle of formulation to implementation. The importance of Audit cannot be ignored for the effective implementation of any system including the OH&S management system in Coal Mines which is one of the most hazardous operating Industries.

3.7. DGMS (Tech.) Circular/MAMAID/08 Dated 29.04.2020 [12th National Conference on Safety in mines recommendations]

The Safety Management Plan (SMP) of every mine shall give adequate priority to developing the Principal Hazard Management Plan (PHMP) based on Risk Assessment and shall provide a suitable organisational structure with adequate resources for reducing the risk level as low as reasonably achievable. It shall be ensured by the owner, agent and manager of every mine that mitigation of such identified principal hazards in auditable mode is done in accordance with DGMS (Technical) Cir. No.3 of 2019 dated 23.12.2019.

In the light of above regulatory requirements and recommendations, a Guidance note has been prepared for the coal industry.

4. GUIDANCE NOTE ON THE PROPOSED SAFETY AND HEALTH MANAGEMENT SYSTEM AUDIT

OSH&W Code, 2020, Coal Mines Regulation, 2017 and DGMS Circulars have provisions for protecting the safety and health of mine workers and those affected by mining operations. These statutes require that risks to safety and health from mining operations be identified and controlled to within acceptable limits and be as low as reasonably achievable (referred to as

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an acceptable level of risk). One of the primary ways to achieve this is that each mine develops a Safety and Health Management System (SHMS) or Safety Management Plan (SMP) that identifies hazards, examines attendant risks and ensures that these risks are controlled within acceptable limits. Under the legislation, the Owner/ Agent/ Managers are given separate but complementary obligations to ensure that this is achieved.

As required under Regulation 104 of CMR 2017, the owner, agent and manager of a coal mine has the obligation to develop and implement the SMP and to ensure the risk to persons from mining operations is at an acceptable level. It is also mentioned that the SMP must contain ways to measure, monitor and evaluate the performance of the safety management plan and to correct matters that do not conform with the safety management plan; and also a plan to regularly review and continually improve the safety management plan;

Now the question is how to assess the effectiveness of the safety and health management system and this *Guidance Note* addresses this question. The basis of the approach taken in the Guidance Note is to consider the safety and health management system as a dynamic system consisting of various subsystems each carrying out a vital function. If each subsystem is found to be working effectively, then the overall system can be considered effective. This approach parallels the approach taken in diagnosing the condition of systems in science and engineering.

This Guidance Note is provided to assist mine operators to meet their obligations under the mining safety and health legislation, to review the effectiveness and implementation of a mine's safety and health management system and to ensure the risk to persons from mining operations is at an acceptable level. The document is not intended to be an exhaustive treatment of reviewing a safety and health management system but a guide.

This Guidance Note on Safety Audit is designed to be a diagnostic tool to assist mine operators to meet their obligations to ensure the system is effectively controlling risk to an acceptable level.

4.1.   Why safety and health management system audit at workplace?

A structured Safety Audit will help to

o assess an organisation's safety and health management system,

o measure its performance and

o ensure continuous improvement.

Safety and health auditing enables to

o assess the performance of the organization,

o identify any problems,

o set up a system to manage problems, then

o follow up to ensure that corrective action has been effective.

4.2.   What is a safety and health management system audit?

As defined in ISO 19011,

o Audit is a 'systematic, independent and documented process for obtaining evidence and evaluating it objectively to determine the extent to which audit criteria are fulfilled.

An audit is a methodical, independent and documented assessment of a business system and processes, in which it is measured against regulated criteria to make sure health and safety standards are being upheld. Organisations should have a management system in place to ensure safety processes continue to be maintained.

It is also desired that the Safety Audit system goes somewhat beyond this, in that it also identifies and reinforces where the system is performing well.

4.3. The objective of Safety Management System Auditing

A Safety Management Auditing System like any other system for its effective implementation shall have the following objective:

a. to check if there is a system in place,

b. is the system suitable, adequate and appropriate for the purpose

c. is the system effective/working i.e., is it known, understood and operated by those who need to know it, understand it and use it?

4.4. Expected Benefits of Audit

Confirmation that the health and safety systems and arrangements meet relevant standards.

Scope for independent external review and assessment by experienced health and safety practitioner.

Ongoing opportunity to demonstrate continual improvement within the organisation.

Verification of the effectiveness of the health and safety management system.

A comprehensive audit report outlining the findings of the audit, quantified outcomes, and associated areas of improvement with detailed recommendations.

Improved safety performance, workforce morale.

Potentially reduced rates of accidents, injuries, ill health, litigation costs and improved productivity.

4.5. Inspection Vs audit

There is a subtle difference between inspection and audit. However, the current experience is that in most cases, a more detailed inspection is conducted instead of an audit. The differences between inspection and audit are:

Traditional inspections identify problems but not system errors.

Inspections identify current deficiencies in activities.

Inspections highlight unsafe acts and conditions but fail to identify system faults and organizational failures.

Inspections are mostly compliance-oriented and human-centric.

Inspections identify the failures but not the root causes of such failures

Audits go into deep to identify the failures, unsafe acts and conditions, and not limited to human errors

Audits highlight the systemic deficiencies as a cause of hazard or unsafe acts/ conditions

Audits provide a system for action to correct the immediate problem and to stop it from happening again.

Audits provide a basis for continual improvement of systems.

4.6. Auditors

Auditors should be trained and understand formal auditing procedures.

Auditing teams should possess expertise in the activities being audited.

Auditors should be able to o carry out an objective review and report findings honestly.

- o communicate well (both in writing and orally), and
- o interact effectively with workers, supervisors and management about their findings.

4.7. Audit team

The Audit team may have two or more auditors, with different specialized backgrounds (e.g., mining, electrical, mechanical, occupational health, etc.) with requisite experience. One of the auditors may be designated as the lead auditor possessing management capabilities and experience, who shall have overall charge and responsibility.

4.8. Qualification & experience of Auditors

a. A Bachelor's degree in an engineering discipline (Mining/Electrical/Mechanical) from an educational institution approved by Central Government.

b. A degree in Bachelor of Medicine and Bachelor of Surgery (M.B.B.S) from an educational institution approved by the Central Government.

c. For graduates of mining discipline:

d. A First class Mine Manager Certificate (Coal) for audit of both UG & OC mines / First class Mine Manager Certificate (Coal-Restricted) for audit of only opencast mines;

An Auditor should have a minimum of Ten years' experience of working in coal mines in an executive cadre as a holder of First class Mine Manager Certificate (Coal) for audit of both UG & OC mines / First class Mine Manager Certificate (Coal Restricted) for audit of only opencast mines. Minimum Five years' experience shall be in UG mine for auditing of UG mines/ Minimum Five years' experience shall be in OC mine for auditing of OC mines.

4.9. Qualification & experience of Lead Auditor

a. A Bachelor's degree in the mining engineering discipline from an educational institution approved by Central Government.

b. A First class Mine Manager Certificate (Coal) for audit of both UG & OC mines / First class Mine Manager Certificate (Coal- Restricted) for audit of only opencast mines;

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The Lead Auditor should have a minimum of fifteen years' experience of working in coal mines in the executive cadre as a holder of First class Mine Manager Certificate (Coal) for audit of both UG & OC mines / First class Mine Manager Certificate (Coal Restricted) for audit of only opencast mines. Five years' experience shall be in UG mine for auditing of UG mines/ Minimum Five years' experience shall be in OC mine for auditing of OC mines.

4.10.   Training of Auditors

A Six-day training program may be conducted for auditors which will include 3 days of classroom training and 3 days of field training. The following topics may be covered in the classroom:

Sl. NO.	Syllabus	Day
1	**Introduction**: 1.1 Why safety and health management system audit at the workplace? 1.2 What is a safety and health management system audit? 1.3 Objective of Safety Management System Auditing 1.4 Expected Benefits of Audit 1.5 Inspection Vs audit	**Day 1**
2	**Statutes and International Standards for Safety and Hearth Management System**	**Day 1**
3	**Features and Elements of Risk-based Safety and Health Management System**	**Day 1**
4	**Principles of auditing**	**Day 1**
5	Methodology of auditing 5.1 Initiating the OS&H audit 5.2 Scope 5.3 Preparing OH&S Aud1t & Audit Plan 5.4 Executing the Audit S.4.1 Opening Meeting 5.4.2 Presentation by auditee, Examination of Records, Field visit, interviews 5.4.3 Audit observations 5.4.4 Audit Recommendations: 5.4.5 Closing Meeting with the Auditee 5.4.6 Audit Report Preparation, Report, Report Distribution, Record Retention, 5.4.7 Action for Implementation of Audit Report	**Day 2**

6	Elements of Auditing and Management Obligations	Day 2
	6.1 General Requirements	
	6.2 Safety and Health Policy	
	6.3 Planning for Hazard and Risk Identification, Assessment and Control	
	6.4 Legal and Other Requirements	
	6.5 Objectives, Targets and Management Plans	
	6.6 Resources, Structure and Responsibilities.	
	6.7 Competency, Training and Awareness	
	6.8 Communication, Consultation and Reporting	
	6.9 Management obligations in this regard include	
	6.10 Safety and Health Documentation	
	6.11 Control of Document and Data	
	6.12 Hazard and Risk Identification, Assessment and Control	
	6.13 Emergency Preparedness and Response	
	6.14 Monitoring and Measurement	
	6.15 Incident Investigation, Corrective and Preventive Action	
	6.16 Safety and Health Records	
	6.17 Safety and Health Audits	
	6.18 Management Review	
7	**Outcome of Safety Auditing**	Day 2
8	**Field Visit**	Day 3 & 4
	8.1 Team Formation	
	8.2 Study of SHMS Documents of Selected Mine	
	8.3 Preparation of Audit Schedule	
	8.4 Preparation of Questionnaire	
	8.5 Carrying out SHMS Audit	
9	**Preparation of Audit Report**	Day 5 & 6
	9.1 Presentation of Audit Report	
	9.2 Suggesting Audit Actions	
	9.3 Closing Audit	

4.11. As provided in ISO19011 **Guidelines for auditing management systems**, the guidance given is based on the seven principles outlined below.

   a. **Integrity:** the foundation of professionalism

   Auditors and the individual(s) managing an audit program should:

   — perform their work ethically, with honesty and responsibility;

   — only undertake audit activities if competent to do so;

   — perform their work in an impartial manner, i.e. remain fair and unbiased in all their dealings;

   — be sensitive to any influences that may be exerted on their judgment while carrying out an audit.

   b. **Fair presentation:** the obligation to report truthfully and accurately

   Audit findings, audit conclusions and audit reports should reflect truthfully and accurately the audit activities. Significant obstacles encountered during the audit and unresolved diverging be truthful, accurate, objective, timely, clear and complete.

   c. **Due professional care:** the application of diligence and judgment in auditing

   Auditors should exercise due care in accordance with the importance of the task they perform and the confidence placed in them by the audit client and other interested parties. An important factor in carrying out their work with due professional care is having the ability to make reasoned judgements in all audit situations.

   d. **Confidentiality:** security of information

   Auditors should exercise discretion in the use and protection of information acquired in the course of their duties. Audit information should not be used inappropriately for personal gain by the auditor or the audit client, or in a manner detrimental to the legitimate interests of the auditee.

   This concept includes the proper handling of sensitive or confidential information.

   e. **Independence:** the basis for the impartiality of the audit and objectivity of the audit conclusions. Auditors should be independent of the activity being audited wherever practicable and should in all cases act in a manner that is free from bias and conflict of interest. For internal audits, auditors should be independent of the function being audited if practicable. Auditors should maintain objectivity throughout the audit process to ensure that the audit findings and conclusions are based only on the audit evidence.

   For small organizations, it may not be possible for internal auditors to be fully independent of the activity being audited, but every effort should be made to remove bias and encourage objectivity.

   f. **Evidence-based approach:** the rational method for reaching reliable and reproducible audit conclusions in a systematic audit process

   Audit evidence should be verifiable. It should in general be based on samples of the information available since an audit is conducted during a finite period of time and with finite

resources. Appropriate use of sampling should be applied since this is closely related to the confidence that can be placed in the audit conclusions.

g. **Risk-based approach**: an audit approach that considers risks and opportunities.

The risk-based approach should substantively influence the planning, conducting and reporting of audits in order to ensure that audits are focused on matters that are significant for the audit client, and for achieving the audit program objectives.

5.   METHODOLOGY OF AUDITING

The safety audit is proposed to be conducted in two phases

Desktop auditing for systems, to determine whether the systems are in place and suitable

Onsite auditing, to verify and determine the effectiveness of these systems.

5.1.   Initiating the OS&H audit

5.1.1. Scope: The lead auditor makes the final decisions on which of the SMP system elements, physical locations and organisational activities are to be audited within a specified time frame.

5.1.2. Audit frequency: The need to perform an audit is determined by mine management taking into account specified or regulatory requirements, significant changes, organisation policy, significant changes in management, technique or products that could affect the OH&S system.

However, it is suggested that an internal audit may be conducted once in a year or immediately after introduction of a new mining method/operation/ process; and an external audit may be conducted once a year.

External auditors shall not be from a firm/institute/company under the same Board of Directors/Proprietor/CEO of the mines to be audited. External OS&H Audit through an agency /firm /institute duly approved by regulatory any authority of Govt. of India or accredited by the International Organization for Standardization (ISO) may also be undertaken for the purpose of external audit.

5.1.3. Preliminary review of Auditee's requirement of OH&S system: Based on the scope of the audit, the Lead Auditor will send a request letter to the mine management for sending specific documents, records and information relevant to the particular element or audit criteria of

OH&S system. The audit team will review the documents to assess whether the SMP is adequate and covered all aspects/activities of the organization. Based on the preliminary review, a detailed questionnaire will be prepared by different auditors on relevant audit criteria and activities.

5.2.   Preparing OH&S Audit

5.2.1. Audit Plan: The audit plan should be finalised by the lead auditor after consultation with the mine management and communicated to the auditors and the mine management. The plan should be made flexible in order to permit changes based on the information gathered during the audit. The plan shall include

a. Audit objectives and scope,

b. Schedule of audit activities,

    c. Identification of reference documents (SMP, a system of standard and auditee's description and specified requirements),

    d. Composition of the audit team,

    e. The Identification of Organisational units,

    f. Schedule of the meeting to be held with auditee management,

    g. List of documents to be perused by the audit team and h) Audit report distribution and the expected date of issue.

5.2.2. Audit Team assignments: Each Auditor should be assigned specific SMP/OH&S elements and functional departments to audit in consultation with the concerned auditors. The lead auditor should hold a briefing session for his team prior to audit to ensure that the preparations are complete and members are aware of their role.

5.2.3. Working documents of the audit team: The documents may include a) Checklists used for evaluating the OH&S/SMP system elements and b) Forms for documenting observations with supporting pieces of evidence.

5.2.4. Questionnaire of Preliminary Information: The lead auditor would send the auditee in this case mine management a questionnaire asking for information about different elements of the OH&S/SMP system. This would be filled up by the mine management and returned for study by the audit team before the field visit.

5.3. Executing the Audit

5.3.1. Opening Meeting: The purpose of the opening meeting is to

    a. Introduce the members of the audit team to the client's senior management,

    b. explain the scope and objective of the audit,

    c. provide a brief summary of the methods to be adopted during the audit,

    d. establish official communication links between the audit team and the auditee,

    e. confirm the availability of resources by the audit team from the mine management,

    f. fix the schedule of the visit of different departments/workings,

    g. discuss the auditee's senior management the

    h. area of concern and areas of focus suggested by the audit team,

    i. confirm the date and time for the closing meeting, and

    j. clarify ambiguities if any, in the audit plan.

5.3.2. Presentation by auditee: Auditee/mine management should make a presentation of the organisation, structure, production process and the OH&S/SMP system.

5.3.3. Examination of Records: Information should be collected through examination of documents and records as required by the Statute, SMPs and SOPs etc. Nonconformities should be noted.

5.3.4. Field visit: Audit team should carry out field visit along with concerned officials of the auditee. A checklist should be prepared based on the audit elements and questionnaire.

Non-conformities shall be noted and pointed to the concerned officials.

5.3.5. **Interviews:** The auditors are expected to interact with various levels of employees including top management to gather information on the OH&S system and its implementation. The information collected through interviews should be verified from other sources such as physical observation and scrutiny of records.

5.3.6. **Audit observations:** All audit observations should be documented. After all activities have been audited, the audit team should review all the observations to flag those to be reported as non-conformities in terms of specific requirements of statutes, standards, SMPs, SOPs or other related documents against which the audit is conducted. The lead auditor shall review observations with the responsible manager/safety officer of the mine and should intimate the Management who would acknowledge the same. When recording a nonconformity, enough details should be provided so that the auditee can reconfirm the observation later. The observations are of two types: Mandatory Corrective Actions (MCAs) and Recommended Corrective Actions (RCAs)

5.3.7. **Audit Recommendations:** The auditor should make recommendations for improvement in the system pointing out and also pointing out the specified non-conformities with the requirement. These recommendations are of two types:

a. for improvement in the system's specified requirement, and

b. for more effective implementation of the specified requirement of the system. It may be noted that the implementation of the recommendation is at the discretion of the auditee but the MCAs are to be fully implemented.

5.3.8. **Closing Meeting with the Auditee:** At the end of the audit, prior to preparing the audit report, the audit team should hold a closing meeting or exit meeting with the higher management and those concerned to present the audit observations and recommendations. The presentation should be done in a clear and concise manner and as perceived during the audit.

The recommendations and audit team's conclusions regarding the OH&S system's effectiveness should also be presented in this meeting. The deliberations of the exit meeting should be recorded.

5.4. **Audit Documents**

5.4.1. **Audit Report Preparation:** The Audit report is prepared by the audit team under the leadership of the lead auditor who is responsible for its accuracy and completeness. It should be issued within the agreed time period, Delay if any, the reasons should be intimated to the auditee.

5.4.2. **Report Content:** The report should faithfully reflect both the tone and content of the audit and shall be dated and signed by the lead auditor. It should contain the following items:

a. An executive summary of the report highlighting important observations and recommendations,

b. Introduction, scope, objective, overviews of the mine, departments, sections, etc.,

c. The name of the audit team members, auditee's representatives and audit dates,

d. audit methodology which is followed,

e. Identification of reference documents against which the audit was conducted (Safety system standards, auditee's safety manual etc.),

f. Observations of non-conformities as well as good practices/Strength and weaknesses,

g. audit team's judgment of the extent of the auditee's compliance with the applicable OH&S system standard and related documentation,

h. the system's ability to achieve defined objectives, and

i. the recommendations for improvement.

5.4.3. Report Distribution: The audit report should be sent to the auditee/mine management signed by the lead auditor. Any additional distribution should be determined by the auditee.

5.4.4. Record Retention: The Audit report should be retained by the agreement between the client, the auditing organisation and the auditee and in accordance with the requirement of the SMP and any regulatory requirements.

5.4.5. OH&S Audit Completion: The audit is completed after submission of the audit report to the client/mine management/auditee.

5.4.6. Action for Implementation of Audit Report: The auditee is responsible for determining and initiating corrective action on audit recommendation. The auditee should prepare an action plan for implementation of the audit report specifying action by the concerned department and the time limit for completion. The time limit for completion may be decided by considering the importance and the safety implications of the recommendations. The communication of the audit observation with the concerned person in the department is to

be made for follow-up. Where no action is proposed to be taken although it may have been recommended in the course of the audit, the reasons for this decision should be recorded. The auditee should develop a monitoring system for implementation and periodically assess the implementation status of the audit report. If needed a follow-up audit can be done to review the implementation of the audit recommendation.

6. ELEMENTS OF AUDITING

SHMS Audit in mines are conducted based on some audit criterion or elements. Each of the elements is reviewed to assess whether the SHMS has achieved the desired standard or objectives of the SHMS. The audit team should look into evidence in support of the element and identifies the gaps if any, or the scope of further improvement

For effective auditing of the Safety and Health, the entire system has been categorised into the following elements and while conducting the audit, the auditor must seek answers for these elements. They are:

6.1. General Requirements: The organisation must commit to meeting legal obligations, manage the hazards and risks and continually improve on its safety and health performance, a structured and effective safety and health management system must be established, documented, implemented, maintained and continually improved.

6.2. **Safety and Health Policy:** A clear statement by the Chief Executive Officer must be available to demonstrate the commitment of top management towards safety and health. S&H Policy provides direction for the SHMS and will drive improvement in safety and health performance

6.3. **Planning for Hazard and Risk Identification, Assessment and Control:** The organisation must put in place documented procedures to identify, assess and control hazards and risks that are likely to cause harm and ensure the involvement of people who have operational knowledge of the area/s where hazards are to be identified, as well as people who are competent in risk assessment and application of effective controls.

Management must follow a recognised process of risk assessment to identify and rank hazards and risks, then identify and prioritise the controls needed; evaluate residual risks after controls are implemented and also maintain a documented hazard/risk register (for larger organisations in particular)

6.4. **Legal and Other Requirements:** To comply with safety and health law as well as other applicable requirements placed upon or subscribed by the organisation, the employer must ensure that regular reviews of relevant standards and legislation are undertaken.

6.5. **Objectives, Targets and Management Plans:** Clear measurable objectives, targets and plans based on the safety and health policy must be established to implement the commitment made in the Safety and Health Policy as well as to demonstrate continual improvement to the performance of safety and health.

Management must Set documented objectives and targets at all levels and functions within the organisation and also establish, implement and maintain safety and health plans to meet the objectives and targets.

6.6. **Resources, Structure and Responsibilities:** Sufficient resources and clear responsibilities, authorities and accountabilities must be established and made available.

Management must ensure the allocation of appropriate resources—financial, technological and infrastructure, including competent people — to ensure that the SHMS can be established, implemented, maintained and improved.

Management must also produce an organisation chart, keep it up to date and make it readily available. Management charts must clearly identify people who have the responsibility, authority and accountability for establishing, implementing, maintaining and improving the safety and health management system.

6.7. **Competency, Training and Awareness:** Procedures must be in place to identify both competency levels and training needs. Standards of competency must be clearly set which address hazards associated with the job. Training must then be undertaken by a competent trainer to ensure these standards of competency are met.

Management must establish, implement and maintain a training and awareness procedure for competency; carry out structured training, or other means, to address the training needs identified; ensure that training and assessment are carried out by suitably qualified persons; ensure that trainees are formally assessed for competency including theory and practical testing where appropriate and keep records of competency training and awareness

6.8. **Communication, Consultation and Reporting:** Effective communication, consultation and reporting must be provided to ensure that those affected by mining operations are aware of the safety and health requirements and to provide feedback on the safety and health needs related to the work.

6.8.1. **Management obligations in this regard include**

Establish, document, implement and maintain means and methods of communication to ensure that all relevant information is communicated to and from all levels.

Establish, document, implement and maintain a procedure to consult employees.

Inform mine workers of the identity of their representative/s.

Document procedures for reporting safety and health performance, incidents and system failures, hazard identification and risk assessment, corrective and preventive action, statutory reporting etc.

6.9. **Safety and Health Documentation:** The objective is to provide a documented safety and health management system that demonstrates how the organization meets its safety and health commitment.

Management must ensure that a safety and health manual (or equivalent) shows how the objective of each element of the mine's SHMS is going to be met.

The manual need not contain full details but will be a reference for finding information on safety and health within the management system.

6.10. **Control of Document and Data:** Documents and data that relate to safety and health must be controlled to ensure the information is correct and up-to-date copies are readily available to those that need to use them.

Management must put in place procedures to control all documents, information and data critical to safety and health including the responsibilities for creation and modification of the various types of documentation and data, making it available and keeping up to date master list or other means of identifying all documents and data under control and their current status and making available current versions of relevant documents at all locations where the safety or health of a person could be adversely affected by the absence of those documents.

Arrangements are made to review and approve changes to documents before issue.

6.11. **Hazard and Risk Identification, Assessment and Control:** An effective process of hazard identification, risk assessment and risk control must be implemented and maintained.

Management must establish, implement and maintain a documented planning procedure for hazard and risk identification, assessment and control (as stated in Element 3); assess the hazards/risks (once the hazards have been identified) to determine the priorities of the controls using the results of the hazard/risk assessment, control those hazards/risks requiring controls using the preferred order of control methods (where practicable).

6.12. **Emergency Preparedness and Response:** The objective is to establish a risk-based emergency management system that identifies potential emergency situations and is prepared to respond effectively where necessary.

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The procedure must include processes for identification, evaluation, preparedness, management and response to potential emergencies and accidents that may cause injuries, illnesses, diseases or property damage.

Management must establish, implement and maintain a procedure to identify and prevent or effectively control any potential emergencies and accidents; establish and test response to deal with immediate control of dangerous situations or withdrawal of people from the identified scenarios of emergency events and accidents; install and test suitable warning and alarm systems (e.g. fire/evacuation alarm, stench gas alarm, flashing lights in noisy areas) and ensure emergency response teams are fully trained.

Management has the obligation to

Make available appropriate and fit-for-purpose emergency and rescue equipment

Train all people in their roles in response procedures

Conduct regular drills

Coordinate emergency procedures with outside organisations (e.g., local fire, ambulance or other mine emergency response resources).

Review emergency procedures regularly.

6.13. Monitoring and Measurement: - Appropriate procedures for inspecting and testing plant/equipment must be in place to help ensure that safety and health requirements are met. Inspection and monitoring of the work environment and employee health must be carried out. Equipment used for inspection, testing and monitoring must be suitable, accurate, reliable and operated by competent people. Monitoring programs must be adequately resourced. Management must

Inspect and test the workplace regularly.

Inspect and/or test critical plants.

Establish a procedure to tag or mark items inspected/tested to ensure that the test status is clearly visible to all users.

Document procedures for work environment monitoring and measurement schemes.

Calibrate all measuring equipment (or otherwise verify its ongoing accuracy) and ensure accuracy is not compromised between test periods.

Establish, implement and maintain a documented procedure for monitoring and measuring the status of each objective and target.

Establish a documented procedure of health surveillance and monitoring.

Health should be monitored where there is potential for them to be exposed to hazards that could have short-term and/or long-term consequences.

Document and maintain procedures to analyse safety and health data.

Identify

o trends for injuries, incidents, near misses,

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o plant and infrastructure damage,

o substandard conditions and/or practices,

o defects in plant and equipment, hazards,

o medical treatment, illness, disease,

o workers compensation claims,

o audit results,

o compliance with legal and other requirements

Circulate reports on safety and health performance to all mine workers.

Establish and implement a documented procedure for regularly evaluating compliance with legal and other requirements

6.14. **Incident Investigation, Corrective and Preventive Action** - Procedures for investigating safety and health incidents and non-conformances and implementing corrective and preventive action to address them must be in place to ensure that safety and health incidents do not recur or are prevented from happening.

Management must

Put in place formal procedures to investigate and trends in relation to injuries, incidents, etc.

Ensure investigation procedures to determine immediate and underlying causes, corrective/preventive action and action to prevent the recurrence or occurrence of potential incidents and non-conformances.

Develop action plans and assign responsibilities clearly.

Put in place follow-up procedures to ensure that effective corrective and preventive action is taken.

Ensure managers, supervisors and workers are involved in the investigations.

Ensure investigators are trained and competent.

Have an effective employee rehabilitation scheme for returning employees to productive work as soon as possible after injury or after contracting disease.

Have an employee assistance program (e.g. professional counselling) in place to help ensure general employee well-being.

6.15. **Safety and Health Records** - Safety and health records are collected and maintained.

Procedures must be in place for identifying, collecting, filing, maintaining and controlling data.

Management must

Put in place procedures for identifying, collecting, filing, maintaining, controlling and disposing of safety and health records.

Ensure these records demonstrate

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o standard of safety and health achieved, and

o implementation and effectiveness of the safety and health system, including the results of audits and reviews.

Records should be legible, identifiable, traceable, stored to allow for easy retrieval, retained for a specified time to meet legal and internal organisation requirements and disposed of in a controlled way.

Records should include

o minutes of safety committee meetings and

o all communication, consultation and reporting incident investigation and improvement records,

o inspection, testing, monitoring and measurement records, including health surveillance,

o hazard/risk identification, assessment and controls,

o audit reports,

o testing and calibration records,

o training, competency and awareness records,

o other legal records as required

6.16. **Safety and Health Audits** - Procedures must be in place to ensure that regular and effective audits of the safety management system are undertaken.

Safety and health auditing enables us to assess the performance of the management system, identify any problems, set up a system to manage the problems, then follow up to ensure that the corrective action has been effective.

Management must

Establish, implement and maintain procedures for audits to verify that activities comply with the SHMS,

Determine effectiveness of the system and identify opportunities for improvement in the system,

Ensure that procedures include requirements for planning, preparing, conducting, reporting, following up and retaining records of the audit,

Ensure that audits are carried out by competent people who are trained in auditing techniques and are able to carry out an objective review and report findings honestly without fear of consequences.

Document audit results and ensure the audit report states systems that are working well, deficiencies found, requirements for corrective action,

In response to the audit, bring the audit results to the attention of all people responsible for the activities,

Determine requirements for corrective and preventive action,

Establish a time frame for corrective and preventive action and notify people responsible for corrective and preventive action,

Ensure management with the relevant responsibility takes timely corrective action following audit results,

Through a follow-up review by the auditor, verify that corrective and preventive actions were implemented and effective.

6.17. **Management Review:** Reviews must be undertaken to ensure the current safety and health management system is still suitable and effective to ensure continual improvement to the safety and health management system and safety and health performance.

Management must implement procedures for periodic reviews to

determine the continuing suitability, adequacy and effectiveness of the management system,

determine any changes needed to the management system (including the policy, objectives, responsibilities and resources) and

confirm the status of the current improvement and

provide for any improvement to the management system and safety and health performance.

Ensure that frequency of reviews is adequate and that they are conducted by senior management.

Maintain records of reviews.

Ensure the effectiveness of the review by using current safety and health performance, the status of objectives and targets, recommendations for improvement, the current status of incidents, corrective action and preventive action, follow-up from the last management review and changes required.

7. **QUESTIONNAIRE**

For each element, a set of questionnaires is to be prepared and possible answers are to be found in different phases of auditing in Tabular form. The auditors should prepare the questionnaire in advance as a guide for conducting the audit based on the elements and subject of an audit. Auditors should try to find out objective evidence against each element and keep a record of that and at the end of the day's audit, the audit observations on each element to be discussed with the management for authentication and verification. The management may be given the opportunity to correct or modify certain observations if they do not agree with the observations. However, such changes in audit observations should be supplemented by appropriate documented and authenticated evidence. It is also expected that during the Audit the **Strength and Opportunities** under each element shall also be explored and noted in the report.

7.1. **Questionnaire:** Following are the examples of such questionnaire for respective audit elements:

7.2. General Requirement

a. Does the Mine Management commit to meet the requirement of the Occupational Safety and Health Code 2020/Mines Act 1952 and the Rules and Regulations framed thereunder and other allied legislation applicable in mines?

b. Do the Mine Management committed to managing the hazards and risks and continuously improving on its safety and health performance?

c. Is there a structured and effective safety and Health Management system established, documented, implemented and continually improved in the mine?

7.3. Safety and Health Policy

a. Does the company have a safety and Health policy?

b. Has it been signed and circulated by the Chief Executive of the company?

c. Whether the OS&H policy is as per the guideline of Statutory provision applicable to mines?

d. When was the policy declared and adopted? Has it been reviewed periodically with the introduction of the new system and machinery in the mine? What is the last date for updating?

e. Whether the Policy is available in the local language?

f. Does the policy find a place in the annual report of the company?

7.4. Planning for Hazard and Risk Identification

a. Whether an effective and up-to-date methodology adopted for Hazard and Risk Identification and assessment in the mine?

b. What are the control measures established for the identified hazards in the mine?

c. Are the supervisors ensuring the hierarchy of controls when implementing control described in the Principal Hazard Management Policy?

d. Are all the mine workers made aware of the Hazard Identification, Risk assessment and control (HIRAC) and their Roles and responsibilities associated with PHMP and SOPs?

7.5. Legal and Other Requirements

a. Whether the provisions of MINES ACT, 1952, Mines Rules, 1955, Mines Vocational Training Rules, 1966, Mines Rescue Rules, 1985, Mines Creche Rules, 1966, Coal Mines Pit Head Bath Rules, 1959, ELECTRICITY ACT, 2003, Central Electricity Authority (Measures Relating to Safety and Electric Supply) Regulations, 2010. , ALLIED LEGISLATION like Factories Act, 1948: Chapter III & IV, Manufacture, Storage & Import of Hazardous Chemicals Rules, 1989 – under Environmental Protection Act, 1986, Land Acquisition (Mines) Act, 1885, The Coal Mines (Conservation & Development) Act, 1974 applicable to Mines are followed? In addition to the above, adherence to respective recommendations of various Conferences on safety in mines and guidelines issued through DGMS circulars shall also be followed.

b. Are the managers, supervisors and workers aware of their duties and responsibilities provided in the Rules and Regulations applicable in the mine?

c. Are all the required permissions from the appropriate authorities obtained and conditions complied?

d. What is the compliance level of the requirement of the statute? (pl. quantify)

e. How many long Pending violations pointed out by the statutory authorities, ISO, safety Committee and workmen's representative in the mine still has not been complied with?

f. What is the average time of compliance of the above violations?

g. What is the compliance level of the earlier audit?

7.6. Objectives, Target and Management of Plan

a. Is there clear and measurable objective targets and Plans based on the Safety and Health Management Policy of the company?

b. Is there a commitment to the Safety and Health Policy of the company by the local management?

c. Is there any sign to demonstrate the continual improvement of the parameters of Safety and Health at the mine level?

7.7. Resources, Structures and Responsibilities

a. Are sufficient resources like Infrastructures, materials, manpower etc. available to fulfill the requirement of the adopted OSH system?

b. Are the resources clearly identified?

c. Is there any procedure for checking the quantity and quality?

d. What is the safety budget? How much percentage of the Budget is the total turnover of the mine?

e. Is the safety budget adequate and how it is arrived at? How much is utilised? What is the pattern of expenditure in the last five years?

f. Does the mine have a clear organisation chart showing the clear responsibility, authority and accountability with respect to the safety management plan of the mine?

g. Is there any incidence of overlapping authority and responsibility?

7.8. Competency, training and awareness

a. Whether training needs to fulfil the requirements of Statute and SMP have been identified?

b. Is there any program of induction training and its duration and topics to be covered

c. whether an assessment of the trainees is being carried out?

d. What is the infrastructure available for training? Whether the same is adequate?

e. Whether training is being conducted by competent trainers? Are the records of training maintained?

f. are the training needs identified whenever there is a change in the existing process, or new machinery is introduced?

g. Are the employees made aware of the importance of adhering to SMP? Are employees been made aware of the potential consequences of departure from the Plan (SMP)?

h. Are employees made aware of the safety impact on their personal performance?

i. Have the employees been given training on their roles and responsibilities?

j. Are all the mine workers, supervisors, managers and engineers including those of the contractors trained in Hazard Identification and Risk assessment? Are all concerned trained and made aware of the SOPs developed under SMP for different activities of the mine?

k. What is the process of evaluating the competency of the person concerned? Is there any panel of evaluators existing in the mine?

l. What is the system of training trainers?

7.9. Communication, consultation and Reporting

a. Are procedures in place for communicating across all levels and both directions from the top downwards and bottom upwards?

b. Are Procedures in place for communications of hazards?

c. Are significant matters communicated to all levels across the organisation including workers? Are procedures in place to investigate all the significant matters?

d. Are the supervisors and managers follow the procedure or protocol for disseminating the knowledge about any event?

e. Is hardware like telephone, walky-talky, cell phones etc. available in adequate quantity and suitably located?

f. Is there any system of communication like meetings, notices, messages, pre-start talks, toolbox talks and circulars available in the mine?

g. Is there any system of dissemination of the contents of SMP like SOPs, PHMPs amongst all stakeholders including the workers?

h. Is there any system of consultation and reporting system while framing and reviewing SMP like "Dos and Do-not Dos" with stakeholders including the contractor workers?

7.10. Safety and Health Documentation

a. Is there any documented Safety & Health Management system available to demonstrate how the mine management fulfils its requirement of Safety and Health commitment?

b. Is the above documents available? Is the risk assessed during the process of above documentation?

c. Are the risk assessment documents of all the identified hazards, SOPs & PHMPs maintained in proper format along with all relevant information, references and reports?

d. Are all practices, procedures and processes related to the safety & Health Management system (Like formats for recording meetings, toolbox talks, accident/incident reporting, action taken reports, inspection reports, pre-start logbooks, check sheets for critical safety activities, feedback formats etc.) properly documented?

7.11. Control of Documents and data

a. Is there any system of control of all the data related to SMP and SMP itself in the mine with a document control register?

b. Is there any identified person as a custodian for the safe custody of all the documents and data? Are the copies of the documents and data readily available for examination?

c. Is there any system in place for deleting redundant documents?

7.12. Hazard Identification, Risk Assessment and Control

a. Is there any planning and accepted process of Hazard Identification, Risk Assessment and Controls (HIRAC)?

b. Are all activities starting from mining to despatch of mineral has been covered in the process of HIRAC?

c. Are all the hazards identified?

d. Who were involved in Risk Assessment? Was a cross-section of employees involved in this process of HIRAC?

e. Was there a good balance of skills in the Risk assessment process?

f. Did the risk assessment team undergo formal Risk assessment training?

g. While identifying the risks is there any technique (Like Energy source-based, contributory factor-based using fault tree analysis etc.) adopted?

h. Are all the control plans developed for all the identified hazards?

i. Are all the persons responsible in the control plan aware of their responsibilities and the time limit by which the control is to be affected to eliminate/minimise the hazard?

j. Are all the resources provided/available to ensure control/elimination of the identified hazards in the mine?

7.13. Emergency preparedness and Response

a. are the potential emergencies in the mine identified? Is there any plan in place for emergency response in the SMP?

b. Are the site plans of all critical areas(including layout, outlets, access route and assembly points) available in the control room?

c. Are the Rescue centres equipped with rescue apparatus connected to the mine? Are all the rescue-trained persons made aware of their duties and responsibilities in case of emergency including the hierarchy of emergencies?

d. Are the resources for dealing with the emergency including, personnel, communication, PAC system, monitoring hazardous gases, emergency shelters, emergency exits, arrangement for evacuation and transport of the injured and other affected persons, medical care and first aid, Rescue cover including equipped Rescue Van, Security cover to deal with law and order in and around the mine readily available?

e. Is the communication facility in the control room with the Rescue Station, fire station and State/district disaster control room available?

f. What is the system of backup power supply /alternate system?

g. Is there any provision for mock drill at regular frequency for checking up the effectiveness and adequacy of the emergency preparedness plan? is there any system for updating of emergency plan as an outcome of the mock drill?

7.14. Monitoring and Measurement

a. Is there any appropriate procedure for inspection & testing of different requirements of provisions of statute and SMP to ensure safety and health requirements? Is the

b. Inspection/monitoring system as per any standard format?**

(** CIL format for Safety Audit (Ch 2- Ch9) may be accepted as the standard for inspection)

c. Is there any system of inspection and monitoring of the work environment for hazardous/toxic gases, dust, temperature, humidity, noise, vibration etc.?

d. Is there any system of monitoring and testing of the health of workers?

e. Are there adequate nos. of competent persons appointed for testing and inspection in the mine? Is the monitoring program adequately resourced?

f. Does the structured guideline/format have the provision to outline the non-conformities of SMP elements and able to ascertain the status of safety of the mine?

g. Is there any system of documentation of the inspection and monitoring, preserving and analysis of the same at regular intervals?

7.15. Incident Investigation, corrective and preventive action

a. What is the procedure for investigating Safety and Health incidences/dangerous occurrences?

b. whether the data for last 5/10 years of reportable and non-reportable accidents/incidents available in the mine?

c. Are all the accidents/incidents investigated and documented and the same is submitted to higher management? Are all the findings communicated to workers?

d. Whether accident/incident analysis is done by Root cause Analysis method/Incident Cause and Analysis Method (ICAM)?

e. What is the nature of incidence/accidents in last 5/10 years?

f. How does the management ensure implementation of the recommendations made after enquiry of the accidents/investigation to avoid recurrence?

g. Are all the accidents/incidents including near misses are enquired by competent persons having knowledge of Root cause analysis/ICAM technique?

h. Is the focus of accident investigation primarily on the organisational factors not only human factors (i.e., deficiencies in the system shall be brought)?

7.16. Health and Safety records

a. What is the system of collecting and maintaining safety and health records?

b. Does the mine keep comprehensive records readily available?

c. Are all the records and procedures related to Health and Safety Management System/SMP documented and records legible?

d. Are the procedures for record storage adequat and indexed for proper identification?

e. Are the document control procedures including ref. no., structural format, the procedure for collection, signed by the person collected and document controller followed?

f. Is the storage of the records secure? Is there a system for maintaining the records in a noneditable electronic format?

7.17. Safety and Health Audit

a. What system is adopted for Safety and Health audit by the owner, agent and manager of the mine for periodic review of SMP?

b. Is there any system of internal audit by ISO? Are the members of the audit team qualified and trained as per the requirement of ISO 19011:2018/IS 14489:2018? At what interval internal audit is carried out?

c. Are external audits also carried out by a competent auditor/s as per DGMS circular no.3 of 2019?

d. Does the scope of the audit include both formulation and implementation of SMP along with the examination of all supporting documents, work plans etc as prescribed in DGMS circular No. 3 of 2019?

e. Are the audit records properly documented/preserved?

f. Are all the non-conformities observed during the audit included while reviewing/ modifying the SMP?

g. Are audit results passed upwards in the company i.e company board? Are the audit results passed to all employees/ representatives?

7.18. Management Review

a. What is the system of management review of the SMP?

b. How the review is conducted at Mine Level, Area Level and Corporate level following a structure in line with the audit criteria?

c. How the reviews are carried out for time-specific events, location-specific (Seam, depth, water regime, mine environment change, etc.) and changes of the procedure?

d. Does the review incorporate audit findings, incorporate continual improvement and include senior company officials and other resource persons?

e. Is the management review properly documented?

f. Are the following points taken up and a decision given if any during the management review?

i. Status of action taken from the previous review.

ii. Changes in external and internal issues.

iii. The extent to which the OH&S policy and its objective is met.

iv. Information on OH&S performance.

v. Adequacy of resources for maintaining the OH&S management system.

vi. Relevant communication with interested parties.

vii. Opportunities for continual improvement.

8. OUTCOME OF SAFETY AUDITING

As explained earlier the Auditing shall be completed with an exit meeting with active participation of all concerned and management may be made fully aware of the outcomes, both positive and negative.

There may be a number of positive outcomes that are reported as 'strengths' and provide a mine with areas where resources do not need to be wasted in improving the part of the 'system' that is working.

Similarly, there may be a number of negative outcomes:

A major deficiency that does not conform to legislative requirements,

A major deficiency that does not conform to the 'system',

A minor deficiency that does not conform to the 'system',

A deficiency that would improve the system if it were to be modified.

9. The Audit team may recommend certain corrective actions based on the outcomes of the audit. The corrective actions may be mandatory in nature where non-compliance may lead to serious and imminent danger or harm to the mine workers. Some corrective actions are recommended to improve safety performance and reduce the risk to an acceptable level. Such MCAs and RCAs with the observations, attributes, corrective actions to be taken, the person responsible, schedule of correction must be incorporated in the audit report. Once the correction status with date and supporting evidence is received the audit may be closed.

10. Recommendations of the Committee

1. Auditing of safety management system as suggested in the guidance note should be introduced in all coal mines in a time bound manner.

2. The Committee suggests that the present system of Safety auditing being practised in the coal companies may continue till the proposed system is well adopted and understood by all.

3. The Committee has suggested the Methodology of Auditing as applicable to all coal mines along with a questionnaire for ease of auditors. The questionnaires are suggestive and not exhaustive.

4. The Committee sincerely expects that large coal companies will develop their internal resources to undertake the proposed auditing job. Duration of the training program should be 6 days including field visits and carrying out sample audit of a nearby mine. Course content is

suggested at Para 4.10, subject to approval of MOC the training may be provided by UGC approved educational institutions.

5. For those coal companies who cannot develop internal pool of resources to undertake auditing job, may opt for External auditing provided the lead auditors and the auditors possess the qualification and experience and have undergone the requisite training as outlined in the guidance note.