

Clean Plants Internal Auditor

Basic Training

General Overview

Introduction

The following material is offered as the mandatory basic training required by all Clean Plants Internal Auditors. Once you have reviewed this document you should record your training in your Clean Plants Nursery Manual (Part B Management Responsibilities) to confirm that you have read this material. A Clean Plants DVD is also available, which explains the Clean Plants program, requirements of the Clean Plants Standard and the role of the Nursery Manual. You may take a more advanced auditing course offered by third-party trainers in your area. However, this not required by the Clean Plants program. Such training will be generic in nature but the basic audit principles will apply to any work environment.

The objectives of Clean Plants internal audits are

1. To confirm that the systems described in your Clean Plants Nursery Manual are routinely implemented in practice by staff at your nursery.
2. To identify areas where improvement can be made in your Clean Plants Nursery Manual. Any systems-based certification scheme centers on the theory that constant improvement is good. It is important that the Phytosanitary Management processes that comprise your Clean Plants system stay in sync with the changes at your nursery.

Why Audit?

Why are internal audits important? You will be more effective in your job as internal auditor if you are aware of the merits of performing internal audits. The following points illustrate why internal auditing is a key component of any systems-based process and of the Clean Plants program in particular:

- To confirm that procedures and records described in your Nursery Manual are routinely implemented at your nursery.
- To facilitate improvements in the Nursery Manual to ensure that your systems and documentation keep pace with changes at the nursery
- To confirm that Clean Plants processes stay concurrent with the requirements outlined in Clean Plants Standard. In theory, the initial review of your Manual and the initial facility review conducted at the beginning of the certification process will have ensured that your nursery's Manual and processes are compliant. From there on, the audit process, both internal and external, will help ensure that changes made, or contemplated, are consistent with the requirements of the Clean Plants Standard.
- To ensure that the Clean Plants program results in a superior phytosanitary program than just shipping inspection alone. The Clean Plants program requires continuous attention of the phytosanitary situation at the nursery. Internal audits play a very important part in that on-going process.
- To prepare for an external auditor's visit. Your nursery will benefit from identification and correction of deficiencies before an external audit. Internal audits can be a huge factor to support "fully satisfactory" ratings from your external auditor. A satisfactory outcome will also save you time and fees.
- To maintain your Clean Plants Certified status The actions of the internal auditor are critical to maintaining this status.

Role of the Internal Auditor

As the internal auditor for your nursery, you have been entrusted with a very important role in your nursery's certification success. You should have been authorized to conduct your job as internal auditor without fear of reprisal or criticism from your peers or your supervisors.

However, it is your responsibility to respect the confidentiality of some of the information you will review. You may be evaluating the performance of other staff members, and you must guard against any form of preconceived opinion or prejudice. Your discretion is expected.

Your main role is to confirm that the Clean Plants procedures used on a daily basis are consistent with the descriptions found in your Clean Plants Nursery Manual. Therefore, your role is to investigate if the Clean Plants Manual is being routinely followed. You do not, however, need to unilaterally create solutions to all deficiencies (or opportunities for improvement) that you discover. The Certification Manager is required to take the steps necessary to correct deficiencies discovered through an internal audit.

Your role as Internal Auditor is also to document and communicate your findings appropriately. This will take place in three ways.

1. You must document the results of your internal audit using the form your nursery has decided to use for this purpose. Many internal auditors use the Checklists supplied in the Clean Plants Standard Appendix 7. Appendix 7c outlines the basic checklist that an external auditor would use when performing the external audit. However, there are other methods of conducting an internal audit which are acceptable as long as your method is documented in the Nursery Manual.
2. You will communicate deficiencies in writing by using Appendix 9 Corrective Action Request form and you will also need to communicate your findings verbally. This will likely occur at a post-audit meeting between you and the people specified in your Clean Plants Manual. This is an important phase of the audit when improvements which might work as solutions are discussed. You will also discuss the timing of implementing the corrective actions required.
3. You must perform a follow-up. It is critical that corrective actions identified in a post-audit meeting are implemented. It may not be your job to implement such actions, but it is your role to follow-up and document the completed corrective actions. An external auditor will not be impressed if he or she finds corrective actions identified in a previous internal or external audit left untouched.

The Skills You Will Use as an Internal Auditor

Your job as an internal auditor is not a simple one. In performing this role, you will use many skills that will improve your abilities as an auditor and an employee. For many, being selected to be an internal auditor will be a personal growth opportunity.

Some of the skills you are likely to use include:

- Ability to scrutinize information
 - to examine documents or actions and assess the critical information and more importantly the missing information or actions.

- Ability to interpret what you see, read and hear
 - to decipher the true meaning of what is being communicated and to translate theoretical statements into real-life actions.
- Ability to observe
 - to spot both deficiencies and achievements.
- Ability to question for clarity and challenge information given to you
 - to ensure that information is understandable, accurate and applicable to the situation.
- Ability to listen to what staff are saying to you
 - to properly understand their messages and to ensure that you don't incorrectly interpret what they are communicating to you. Sometimes it is helpful to confirm what you think you heard the person say.
- Ability to be objective and free of bias
 - to evaluate procedures and documents you audit with an open mind and with no preconceived ideas and to be fair to all but still respectful of the requirements of the Clean Plants program.
- The ability to be fair but firm
 - to ensure that you are a dispassionate judge of what you are having to consider,
 - to ensure that you are not influenced through inappropriate means (intimidation, seniority, faulty logic, etc.) from a position you have taken.

The Tools You Will Use as an Internal Auditor

You will have a complete set of tools and references to use in your job as an internal auditor. They include:

- Your Clean Plants Nursery Manual will be your primary reference because it is this manual that you are comparing all your observations against.
- The Clean Plants Standard and Appendices. Section 4 provides an overview of both the internal and external audit processes. Appendix 7d contains a detailed overview of the Clean Plants external audit system and will be useful as background when preparing an internal audit. You may wish to follow as closely as you can methods used by an external auditor in order to catch and fix problems in-house before an external auditor becomes involved.
- "Clean Plants Workshop" DVD which is available online at www.cleanplants.ca must be used as a training aid and will provide additional guidance on the key aspects in each section of your Clean Plants Manual.

- Appendix 7c “Checklist for External Auditors” will be your primary tool for conducting internal audits in order to simulate a similar template as the external audit. Simple editing of the top page could turn this document into your nursery’s internal audit document. The Checklist contains questions about critical aspects of the Clean Plants systems used.

Various references provided from time to time by CNCI that explain, interpret or clarify requirements.

Previous internal and external audit reports are key references and recently done audits should always be reviewed before you start a new audit. They will direct you to particular items, that were problematic in the past, to check and confirm. You will want to ensure that all non-conformances from recent audits (those from the previous year) have been addressed and that the corrective actions from past audits have been implemented. In your current internal audit you will investigate that these corrected procedures are still in use. You should also confirm that appropriate modifications are made to the Clean Plants Manual whenever a corrective action results in a change of procedure.

Techniques Used In an Internal Audit

The techniques available to an auditor to complete the task can be varied. Some of the most commonly used techniques are listed below.

- Compare what you are observing or learning from staff to the description that appears in the Clean Plants Nursery Manual. Consider not only the description of the procedure but the frequency described.
 - For example if the pest scouts tell you they perform pest monitoring whenever they feel pests might be present and the Clean Plants Manual states that monitoring occurs every two weeks, you have an inconsistency that must be corrected even if the way they perform and record the monitoring is perfectly matched to the description in the Nursery Manual.
- Compare the evidence found in actual records to the theory described in the Nursery Manual.

Examples:

 - You need to confirm that pest monitoring records dated every two weeks is the frequency stated in the Clean Plants Manual. Even if no pests are detected, a record must be made and filed at the frequency stated in the Nursery Manual.
 - You must confirm that staff Clean Plants training records list courses that staff have recently taken.

- You must examine records (for example shipping documentation) and confirm that the information listed in the Clean Plants Nursery Manual is consistently found on these records.
- Confirm that procedures are operational on an on-going basis.
 - It is not acceptable to describe procedures in a Nursery Manual as if they are used throughout the year and then find in reality that they are operated only seasonally or sporadically.
- Observe actions in real time, question staff and compare these realities to what is published in the Clean Plants Nursery Manual.
- Ask for examples of documents to be pulled from the file or look in appropriate files to confirm that Nursery Manual procedures are consistently carried out. If the Nursery Manual states that a certain process is checked and recorded on a particular document, there must be historical evidence of this occurring over time.
 - It is not sufficient for a staff member to say that a task is always done but only mentally recorded and acted on only when action is needed.
- Ask to have procedures demonstrated.
 - For example if your manual states that trace back can be done by referring to various records, invoices etc., you could either look at those documents and confirm that the information is accessible. You can also ask the appropriate staff to demonstrate trace back of a plant that you randomly select from inventory and determine if this trace back can be done in a reasonable period of time. The staff should be able to use the trace-back process outlined in the Nursery Manual to discover the source of the plant. If they have to take other steps to accomplish the trace back, the Nursery Manual procedure is in non-conformance and must be revised.
- When a procedure requires the use of reference material, you are free to ask staff performing the duties to show you their copy of the reference. If this reference is not readily at hand, it is highly likely that it is not being used as outlined by the procedure in the Nursery Manual.

Internal Audit Steps

The following are the key steps to complete an internal audit. You can add additional items to this list which are appropriate to audit your Clean Plants nursery procedures.

- If you are a small company, you may audit yourself. You may also 'trade' audit time with another small nursery grower, so you can both benefit from an objective, 'outside' perspective.

- Review the Clean Plants Standard before you start an audit. It is always a good idea to have a clear perspective of the program requirements as it is this Standard on which your Clean Plants Manual was approved in the initial certification process.
- **You do not have to audit absolutely everything on each internal audit.** Review your Nursery Manual to confirm the Parts that are to be audited and at what time of year (Part J: Internal Audits). However, all of the Parts within the Nursery Manual must be audited within one calendar year.
- Review your Clean Plants Nursery Manual or review each Part as you go through your Internal Audit Checklist. You will be comparing what you observe to what is written in your Manual and will need to understand the procedures stated in the Nursery Manual.
- Review internal and external audits done in the last twelve months paying particular attention to any non-conformances, observations and deficiencies noted. You will want to confirm that corrective actions were taken and subsequently confirmed and documented. The “loop will be closed” when your current audit confirms that a new procedure is still working properly. It is better for the internal auditor to make this determination than leave it for an external auditor to catch.

Consult the Clean Plants Appendix 7d which describes the scope of external audits. The directions outlined in this Appendix will apply to your internal audits as well.

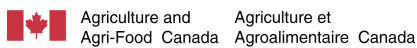
Complete your audit using your Audit Checklist and file it in your records. If you are completing it electronically, the form will expand to accommodate notes you wish to add. If you are using the form and recording your findings manually, you may need to use additional space on the back of the page or add pages. Don't let the structure of the form limit what you want to record. Try to be as clear as possible, as others, including external auditors, will be reading your words and they need to understand them.

- If the audit reveals items that need to be corrected, complete the appropriate portion of your Appendix 9 Corrective Action Request (CAR) form so it is ready for discussion at the post audit meeting.
- Meet with your Certification Manager and others, as detailed in your Clean Plants Manual, and review your audit report. Feel free to point out positive observations as well as the areas where corrective action is necessary. You may want to discuss with the Certification Manager a strategy for communicating the audit results to nursery staff as they will be interested in how they performed. Don't forget to acknowledge good performance, as well as deal with the need for correction. For non-conformances where corrective action is required, you and the certification manager will discuss, and agree to a Corrective Action Implementation Plan noted on the Corrective Action Request form. This will become the management's commitment to take action by a specified date. Follow-up for each Implementation Plan should be scheduled soon after the completion date.
- You will need to manage your schedule to ensure that you complete at least two internal audits per year: one during the growing season and one during the shipping season, as stated in Section 4.1 in the Clean Plants Standard. Of course more than this minimum of internal audits can be done.

Take Pride in Your Work

You have been assigned a very important role in the implementation of the Clean Plants program at your nursery. Your internal audits will help your establishment improve its systems, retain its certified status and produce healthy, pest-free plants. Take pride in your contributions to the team's success.

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