

Following up after a BCMS audit

In this article I consider an aspect of auditing which at best is rushed and at worst, overlooked. The Follow-up Audit. Picture the scene; the audit of your business continuity management system is over and the auditor has left a list of findings for you to consider. You think this is the end of the audit and you can work on the issues at your convenience. But what happens if the auditor says they're coming back?

What is a follow-up audit?

Having been through an audit (this could be an internal or third party audit), the auditor may have identified issues which in their opinion, require further consideration or action. Some may be observations which you are asked to consider but are not obliged to act on whereas others may have been raised on a more formal footing, such as a nonconformity or major nonconformity? With internal audits, the phrasing will depend on how findings are raised, the culture of the organisation and the expectations of the audit process. Third party audits tend to apply a more consistent use of language and for the sake of clarity I will use formal auditor terminology.

The auditor identifies one or more nonconformities during the audit process. They raise these with the auditee (the person being audited) at the time they are discovered as well as discussing them again during the closing meeting. They are also formally confirmed in the written report. The extent of any corrective action required is for the auditee (or management) to decide and this will be communicated to the auditor. This may be whilst the audit is still going on but the auditor should more often than not, encourage the auditee to reflect on the findings and allow time to consider root cause and any business implications. Receipt of a corrective action plan, (which should include what is to be done, by whom, when etc) is usually agreed and communicated to the auditor at a later date. In any event, during the closing meeting, it is the responsibility of the auditor to ensure that actions will be determined and put into effect and ideally, whilst fresh in the minds of the auditee, agree a reasonable timeframe by which the actions will be completed. It is also the responsibility of the auditor to review the proposed action plan and comment if they do not consider it appropriate.

Based on the above, the auditor decides whether or not a follow-up audit is necessary. The circumstances making this more likely include;

- The severity and impact of the nonconformities identified
- Doubt over whether the actions will be adequately addressed if left unchecked
- The time until the next scheduled audit
- Where in the audit cycle you are and whether progression to the next stage is determined by successful closure of outstanding nonconformities

What happens next?

If a follow-up audit has been agreed, it remains the responsibility of the auditor (or Lead Auditor if there is more than one in the audit team), to confirm that the proposed actions have been implemented in such a way which reduces or eliminates future, similar, nonconformities. This check may be carried out remotely, usually where the changes are limited to document amendments or the provision of other easily verifiable evidence or, where a more substantial response is required, a return visit to the auditee's site may be confirmed.

Where a return visit is scheduled, the timeline for this will depend on the complexity of corrective action. It could be anything from 1 -6 months but should have the buy in of all parties.

Ideally, the auditor should return to meet the auditee in order to find out what they have done to address the issues. Ownership for closure should have been allocated when the corrective action plan was developed.

Follow-up audits should result in formal acceptance and closure of the findings and therefore the audit itself, by the auditor. How this is communicated will depend on the nature of the audit, findings and possibly the culture of the organisation. As a minimum, written confirmation via email and ideally, a written report, should be produced and issued to the auditee, confirming acceptance of actions and, if assessed, their effectiveness.

Common barriers to successful audit closure

Audits are generally scheduled as part of an audit programme. This may mean that specific months or dates are allocated for the audit to take place and the duration of the actual audit will be confirmed, either by management for internal audits, or the certification body, for third party audits. In any event, it generally won't take into account the potential for a follow-up audit. It therefore becomes problematic for an internal auditor to find, or be given, additional time to spend reviewing actions, reporting and formally closing an outstanding audit.

In reality what often happens is;

1. The tool deployed (if there is one) to log, track and close actions/nonconformities is used to monitor and close audit findings without further intervention from the auditor; or
2. Corrective actions are left unaddressed until the next audit; or
3. Ownership for the actions is unclear and no-one ends up taking responsibility for the work

Whatever the reason, it is all too easy to overlook the need to complete the audit process and therefore, ensure any corrective actions are effectively implemented and benefit the organisation, going forward. Despite being included in a number of auditor training courses, it seems this is an area which, for the reasons given above, is not afforded the attention it deserves.

Conclusion

It's no surprise that audits which have a clear and planned outcome offer far greater benefits to the organisation. I see this time and again on my auditing travels and where I am the nominated "internal auditor" will always insist on a meaningful follow up approach. After all, what's the point of being audited if you don't want to know where the gaps are and seek to improve as a result of plugging them!

Your management team should be pressing for information about the outcome of every audit and where required, confirmation that follow up audits have been completed. If they don't, why not take the information to them and prove what a worthwhile exercise it has been! Good luck.

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