



ANS Audit Training

Day #2 – Audit Techniques

ICAO Bangkok Regional Office

December 2024





Summary

- Definitions
- Different types of audit
- Audit Chronology
- Behavior & Human factors



- Definitions
- Context of the audit
- Audit Chronology
- Behavior & Human factors

Definitions



- **Audit**
- **Auditor**
- Audit evidence
- **❖**Non-compliance
- **❖**Weak point
- Strong point
- *Records
- Corrective/Preventive actions
- Inspection



- Definitions
- Context of the audit
- Audit Chronology
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What is an audit?



"Systematic, independent and documented process for obtaining audit evidence and evaluating it objectively to determine the extent to which audit criteria are fulfilled."

ISO Standard

- → SMS (Safety Management System) audit focuses on safety management and safety performance.
- → QMS (Quality Management System)audit focuses on quality management and quality performance.
- → IMS (Integrated Management System) audit focuses on all the components of the management system and on each performance (safety, security, environment, quality ...).



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What is an auditor?



Person with the competence to conduct an audit

ISO Standard

And is authorized!



- Definitions
- Context of the audit
- ❖ Audit Chronology
- Behavior & Human factors



What is an Audit evidence?

❖ An audit evidence is anything that proves a fact

Document

Observation



« Oral statement»: is it an evidence?

Oral statement

Only if cross-checked with other statements or documents



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Non-compliance (or Non-conformity)

Non-Compliance (NC): deviation from the specified SMS requirements. The reference of the unrealized requirement must be specified in the writing of the non-compliance: versus annex 19 or SMS manual or a procedure.

Example 1 : non-compliance

Number	Explanation of non- compliance	Requirement
1	The safety policy does not comply with the expected. This policy is incomplete, unsigned, poorly disseminated and not known.	1.1 Management commitment 1.1.1 The service provider shall define its safety policy in accordance with international and national requirements. The safety policy shall: a) reflect organizational commitment regarding safety, including the promotion of a positive safety culture; b) include a clear statement about the provision of the necessary resources for the implementation of the safety policy; c) include safety reporting procedures; d) clearly indicate which types of behaviours are unacceptable related to the service provider's aviation activities and include the circumstances under which disciplinary action would not apply; e) be signed by the accountable executive of the organization; f) be communicated, with visible endorsement, throughout the organization; and g) be periodically reviewed to ensure it remains relevant and appropriate to the service provider.



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Non-compliance (or Non-conformity)

Non-Compliance (NC): deviation from the specified SMS requirements. The reference of the unrealized requirement must be specified in the writing of the non-compliance: versus annex 19 or SMS manual or a procedure.

Example 2 : non-compliance

Number ²	Explanation of non- compliance	Requirement
2	The manual ATCO that has been checked in the tower (V3 02.07.17) is not approved and its control list is empty. Moreover, its version is not up to date (current version is V4 05.06.18 in the office of the chief of the tower).	1.5 SMS documentation 1.5.1 The service provider shall develop and maintain an SMS manual that describes its: a) safety policy and objectives; b) SMS requirements; c) SMS processes and procedures; and d) accountability, responsibilities and authorities for SMS processes and procedures. Manual SMS V1.4: 2.1 documentation. Procedure management of documentation: 4.1



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Non-compliance (or Non-conformity)

- → The non-compliances may be of documentary or application origin.
 - **❖ A documentary** non-compliance is when the practice is satisfactory but insufficiently formalized.
 - ❖ An application on-compliance is when the practice does not meet the requirements of the safety management system.

Example of "documentary" non-compliance : the documentation is correctly managed but there is no procedure describing this management.

Example of "application" non-compliance : the documentation management procedure exists but the documentation is not handled correctly and according to the procedure.



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Weak Point Opportunity for improvement (Weak Point)



Opportunity for improvement (or weak point): Improvement must be done on identified weaknesses, or suggestions of preventive actions.

Examples of opportunities for improvement

Number	Opportunities for improvement
1	Management reviews are implemented and generate strategic actions as well as corrective actions. The reports should be more explicit in order to better inform all the agents: attendance list must be mentioned, appendices should show the updated actions, the updated action plan, the internal audit program (validated), the program of planned changes (validated)
2	The Civil Aviation Authority has validated the ATCO manual by letter ref 123/12 of 25/07/18. However, the reference of the approved version is not mentioned.
3	Some ACAP tables are not well managed (missing or outdated target dates). A more rigorous monitoring of the management of these ACAP tables must be put in place. The arrival of a new tool should improve this monitoring.



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Strong Point



Strong (or satisfactory) point: Point on which the requirement are fully implemented.

An important progress on the implementation of requirements can be also consider as a strong point.

Examples of strong points

Number	Strong points					
1	The security of the accesses of the sensitive premises is insured: checking at the entrance of the technical block, the tower and the ACC.					
2	The management of safety studies demonstrates great professionalism and strong ownership of the procedure. The safety studies conducted for project A are particularly successful.					
3	SMS sensitization carried out : management of documentation and mapping (13/02/14), SMS manual and procedures (18/03/15), SMS implementation (06/03/15).					



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Records



Record: a document that provides tangible evidence of activities performed (minutes of meetings) or results obtained (indicators).

During an audit records shall be consulted.

As an audit must be factual, the references of the records consulted must be included in the audit report.

- Planning of preventive maintenance for years 2016, 2017, 2018.
- Files of results of preventive maintenance for years 2016, 2017, 2018.
- Inventory of Replacement Modules List of Spare. (V1.2).

For the auditors it is important to note all the checked records

An exhaustive list of the records examined shows the quality of the work done by the auditors.

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Records



Examples of records

Documents defined as records must be listed in the records procedure. They must be known to the agents concerned.

Record	Acces	Who	Where	Support	Duration	Archivage
Minutes of management review	Free	Safety Manager	G:\Dir_CRNA\SMQS\revues	Electronic	3 years	5 years
Audit reports	Free	Safety Manager	G:\Dir_CRNA\SMQS\audits	Electronic	3 years	5 years
LOAs	Free	Chief Subd OPS	G:\EXPLOITA\Doc_Ops\LOA	Electronic	3 years	5 years
Safety occurrences analysis	Confi- dential	Chief Subd Safety	Office Chief Subd Safety	Paper	3 years	5 years



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Corrective actions: they are implemented to deal with findings of audits (non-compliances, opportunities of improvement) and causes of safety occurrences).

Corrective/Preventive actions actions

Preventive actions: they are implemented to deal with potential findings.

- Corrective and preventives actions are stored in a table (CAPA)
- **❖** Each non-compliance must be subject to one or more corrective actions. The use and monitoring of corrective actions is a key element of SMS operation (traceability, continuous improvement of safety).
- ❖ The opportunities of improvement can be managed with corrective actions in the same way than non-compliances.



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Corrective/Preventive actions actions



Number	Explanation of non-compliance	Requirement
1	The safety policy does not comply with the expected. This policy is incomplete,	1.1 Management commitment 1.1.1 The service provider shall define its safety policy in accordance with international and national requirements. The afety policy shall:
	unsigned, poorly disseminated and not known.	a) reflect organizational commitment regarding safety, including the promotion of a positive safety culture; b) include a clear statement about the provision of the necessary resources for the implementation of the safety policy; c) include safety reporting procedures;

Link between audit findings and corrective actions.

Ref	Origin	State of Implementation	Finding	Who	When	Actions	Effectiveness Criteria
XXX	Audit YYY NC1	In progress	The safety policy does not comply with the expected. This policy is incomplete, unsigned, poorly disseminated and not known.	Safety Manager	June 2025	Action1. Rewriting of the policy. Take into account policies of similar providers. Done 05/09/24 Action 2. Meeting with main managers to approve the policy. Done 22/09/24 Action 3. Diffusion of the policy (mail, manual). Done 28/10/24 Action 4. Action of sensibilization of personnel involved in the application of this policy. Planned 05/06/2025	Policy Rewrite and known. Check with an internal audit in September 2025



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What is an Inspection?

An inspection is a verification made by an inspector (or auditor) not necessarily based on requirements but on expert judgement

Audit = Regulatory framework

« The manual ATCO that has been checked in the tower (V3 02.07.17) is not approved and its control list is empty. Moreover, its version is not up to date (current version is V4 05.06.18 in the office of the chief of the tower)." Inspection = Expert judgement

« Inspection showed the level of commitment of the high level management is weak regarding the safety objectives »

Regulatory reference + Non compliance

No Regulatory reference + Recommandation



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Audit context



- Different types of audits
- **❖**Goal of an audit
- Scope of an audit
- ❖ How to succeed ?



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Different types of audits



❖ External audits are done in order to check, monitor and certify (safety by CAA and quality ISO 9001 by an agreed company).

❖ Internal audits are used to survey the SMS.



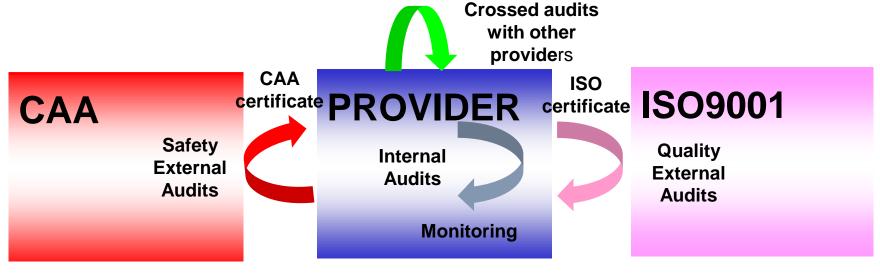


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Different types of audits



Different types of audits: internal, external (safety by CAA, quality by ISO).



Who: CAA auditors

Periodicity: To be defined

Who: provider auditors

Periodicity: yearly

Who: ISO auditors

Periodicity: Yearly



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Goal of an audit



The goal of an audit is to detect malfunctions and allow the implementation of improvement actions.

They must be considered by ALL (CAA and providers) as vectors of improvement.

External audits: CAA and providers should improve the safety level of civil aviation of the State.

Internal audits: auditors and auditees should improve the safety level the provider.



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Scope of an audit



For an SMS audit the scope can be all or part of Annex 19.

For an QMS audit the scope can be all or part of ISO 9001.

For an internal audit the scope must be defined. It can be all or part of Annex 19 and/or ISO 9001.

Sometimes it can be useful to carry out a thematic audit (documentation, skills management, security studies ...) to evaluate and improve weak areas.



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How to successfully complete an audit?

An effective and serious preparation.

An audit accepted and understood by the auditees.

Explain and convince: audit is a vector of progress.

All participants must be convinced that the provider and the supervisory authority (or internal auditors) have the same goal: to improve safety.



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Audit Chronology



- **❖** Audit Programme
- Audit Planning
- Audit Preparation
- Opening Meeting
- Interviews
- Closing Meeting

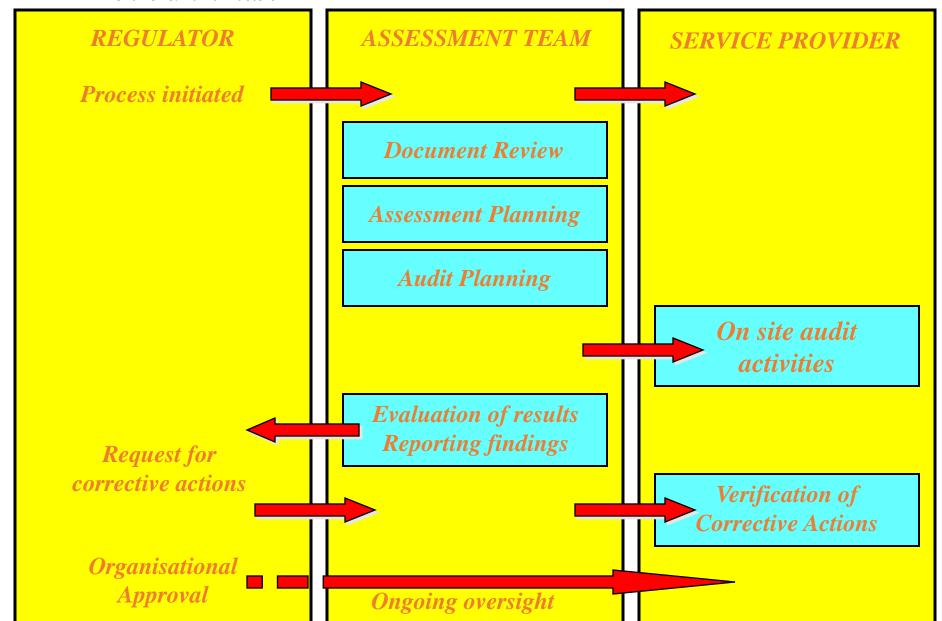




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Audit steps	Documents	Actions
	Annual audits program	Annual audit program (internal) is defined by the service provider. External audits are included in this program. →For each audit the scope is identified by the CAA
Preparation	Audit planning	The audit planning contains the list of agents interviewed and the time slots. It can be adjusted during the opening meeting.
	Documents for audit preparation	The documents required for the preparation of the audit are requested by the responsible of audit. The audit team meets to prepare the audit.
Opening meeting	Audit planning Auditors' notes Records Restitution of audit Audit report	The audit planning can be modified during the opening meeting.
Interviews		The auditors take notes during the interviews (used for the restitution and the audit report). The records are observed during interviews by auditors.
Closing meeting		During the closing meeting a short report of the results of the audit is made.
Audit report		The audit report is drafted as soon as possible after the audit and sent to the head of the organization audited.
Define and implement corrective actions	Correctives actions	The provider should define and implement corrective actions to correct non-conformities (and opportunities of improvement).



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Audits program



The CAA must establish an external audit programme:

- All ANSP providers;
- All necessary scopes for each audit;
- In general annually or every two years.

External audits must be planned in coordination with the ANSO that will be audited to take into account:

- Availabilities of the ANSP teams;
- o The



Priority must always be given to operational work

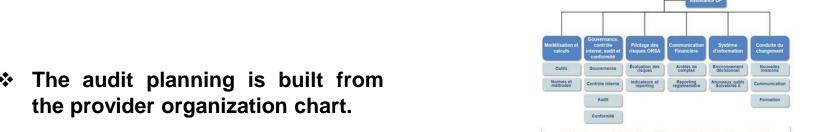
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Audits program (example)

CAA Annual Audit Programme					
Numéro	Du	Au	ATC OPS	Days	Scope
1	11/01/2025	18/01/2025	Marseille Tower	4	Annex 19 – All requirements
2	01/02/2025	08/02/2025	Bordeaux ACC	2	Annex 19 – SMS Documentation
3	22/02/2025	01/03/2025	Toulouse CNS Office	5	Annex 19 – All requirements
4	22/03/2025	29/03/2025	Brest ACC	5	Annex 19 – All requirements
5	21/04/2025	26/04/2025	Strasbourg Tower	5	Annex 19 – All requirements
6	17/05/2025	24/05/2025	Lyon (Tower+CNS)	5	Annex 19 – All requirements
7	25/05/2025	31/05/2025	Paris CDG (Tower)	5	Thematic audit on safety events (National french regulation)
8	23/08/2025	30/08/2025	Paris CDG (CNS Office)	5	Annex 19 – All requirements
9	20/09/2025	27/09/2025	Paris Orly Tower	5	Annex 19 – All requirements
10	18/10/2025	25/10/2025	Aix-en Provence ACC	5	Annex 19 – All requirements
11	25/10/2025	01/11/2025	Paris ATFM Head Quarters	2	Annex 19 – External services
12	04/11/2025	04/11/2025	DSNA Headquarters	7	Annex 19 – Safety Assurance
Total A	nnée 2025			78	



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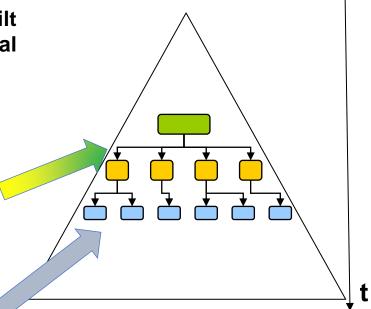
- Interviews are either individual or groups (ATCO, ATSEP, pilots, maintenance technicians ...).
- If possible they are done in the auditees office (easier for auditees to find documents ...).
- Auditors must go in operational and technical rooms to check the documentation and the working conditions.
- **❖** No interview with persons working on real time.
- ❖ To build the audit planning you must take into account the time you need to go from one office to next one.



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The audit schedule is generally built starting from the highest hierarchical **level** (but not mandatory)

The interviews with the highest level are done to know what decisions and actions have been taken (definition of a policy, responsibilities, objectives, etc.).



❖ During the next interviews the auditors will try to measure whether the actions decided at the highest level have been correctly disseminated and are known by all the agents.



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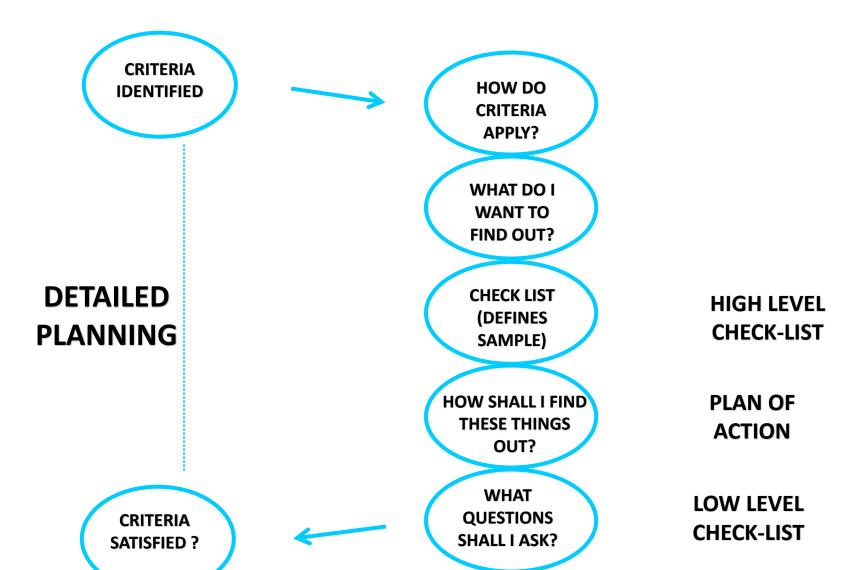


- ❖ Reserve a free slot at the end of the day for further interviews and for a debriefing meeting with the safety manager.
- ❖ At the end of each day you must plan a slot for coordination among all the auditors.
- ❖ Anticipate before the closing meeting, a time slot sufficient to prepare the restitution.
- ❖ The audit planning is forwarded to the organization for approval. It may be amended at the opening meeting.
- It is necessary to be flexible in case of operational constraints.



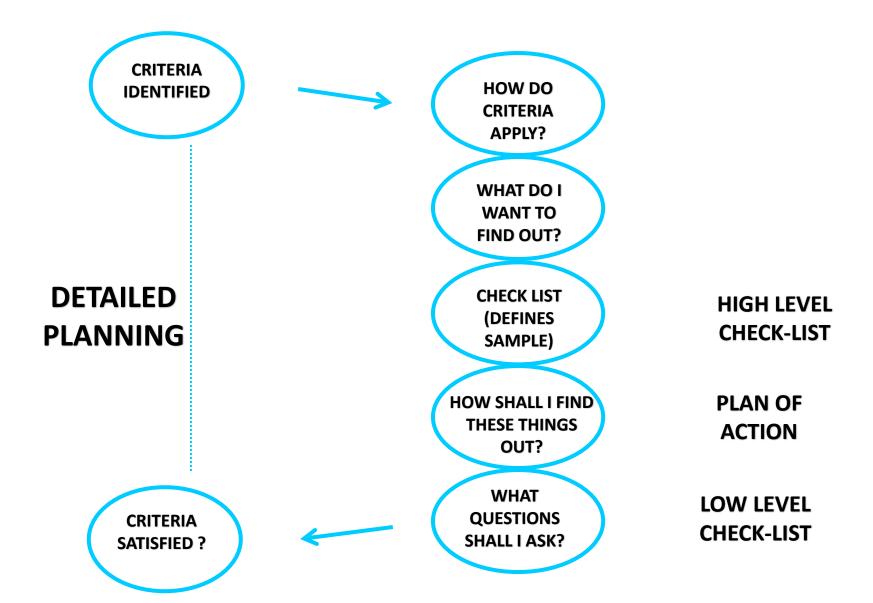
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- Definitions
- Audit planning: Exercise
- Audit Chronology
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Audit preparation: documents.



Auditors can ask all documents they need.

Documents that are essential to prepare audit:

- SMS manual,
- Minutes of the last safety management review.

Documents that can be asked:

- Procedures,
- Safety studies,
- Operational documentation,
- Audit reports.



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Audit preparation: documents.





Be careful not to ask too many documents before the audit.

- If you ask a lot of documents you cancel surprise effect.
- ❖ The surprise effect is an audit tool that can help auditors to check if:
- auditee know which document the information is in,
- auditee has the document,
- auditee can find it.



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Audit preparation: what ask and to who?

During audit preparation you must define for each auditee what points you want to discuss with him.

- ❖ Depending on the hierarchical level and the functions performed by the auditee, some points do not concern him.
- **❖** You can find informations on this in the audit guide.



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Opening meeting



The responsible of audit leads this opening meeting. Attendance: auditors and all the auditees.

The responsible of audit explain the goal and the perimeter of the audit.

The audit planning is checked and amend if necessary.



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Audit realization: interviews



Interviews are conducted according to planning.

Very important: auditors must respect scheduled times.

If need, a new time slot must be found.



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Audit realization: notes taking during interviews

Notes taking is a difficult exercise. Everyone must develop his own method. Below is an example. A notebook is a good medium.

Activity and/or place	Notes	Documents checked with references
TWR site XXXX	Management of documentation good + Instructions not archived -	Manuel TWR V4 12/12/08

Each auditor must take notes.



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Closing meeting



A restitution must be done during the closing meeting.

Restitution includes:

- Reminder of the scope
- A synthesis of the audit
- Strong points
- Non-conformities
- Opportunities for improvement

Thank the auditees for hospitality & cooperation

(Even if there was none!)

- → The closing meeting is generally done with the same attendance than the opening meeting
- → The attendance at opening and closing meetings demonstrates the importance of the audit for the organization. It's an information for the auditors.



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Your oral restitution will be easier if you use a PowerPoint support.

- Fully implemented.
- Going to full implementation will take short time.
- Going to full implementation will take long time.

For each requirement 3 implementation levels: starting, partial, completed.

ln	black	annex	19
re	quiren	nents `	_

	/			
Anney 40 Beguirement		SMS		
Annex 19 Requirement	Starting	Partial	Completed	
1. SAFETY POLICY AND OBJECTIVES				
1.1 Management commitment				
Commitment of main managers				
Policy : content, signed				
Policy : dissemination and knowledge				
Action plan				
1.2 Accountabilities and responsibilities				
Responsibilities defined			•	
Responsibilities known and applied				
1.3 Appointment of key safety personnel				
Safety manager				
Role of safety manager				



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You must explain your choices:

Why starting or partial or completed?

Why or or ?

		SMS		
Annex 19 Requirement	Starting	Partial	Completed	
1. SAFETY POLICY AND OBJECTIVES				
1.1 Management commitment				
Commitment of main managers				
Policy : content, signed				
Policy : dissemination and knowledge				
Action plan				
1.2 Accountabilities and responsibilities				
Responsibilities defined				
Responsibilities known and applied				
1.3 Appointment of key safety personnel				
Safety manager				
Role of safety manager				

Examples:

Policy: content, signed

Policy is elaborated by main managers (seminar) and signed by the chief.

We can find axes of improvements. => completed



All the responsibilities have been defined. For CNS division they have not yet been sent to personnel. => partial

Role of safety manager

Safety manager has been appointed. But today some managers does not consider him as a member of the management team of the organization. => starting



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Annex 19 Requirement	SMS		
	Starting	Partial	Completed
1. SAFETY POLICY AND OBJECTIVES			
1.1 Management commitment			
Commitment of main managers			
Policy : content, signed			
Policy : dissemination and knowledge			
Action plan			
1.2 Accountabilities and responsibilities			
Responsibilities defined			
Responsibilities known and applied			
1.3 Appointment of key safety personnel			
Safety manager			
Role of safety manager			

Examples:

Policy: content, signed

Policy is elaborated by main managers (seminar) and signed by the chief. We can find axes of improvements. => completed

Responsibilities known and applied

All the responsibilities have been defined. For CNS division they have not yet been sent to personnel. => started

Role of safety manager

Safety manager has been appointed. But today some managers does not consider him as a member of the management team of the organization. => started

The graphic synthesis can be consider as the first step to the writing of the audit report.



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Annov 10 Requirement	SMS		
Annex 19 Requirement	Starting	Partial	Completed
1. SAFETY POLICY AND OBJECTIVES			
1.1 Management commitment			
Commitment of main managers			
Policy : content, signed			
Policy : dissemination and knowledge			
Action plan			
1.2 Accountabilities and responsibilities			
Responsibilities defined			
Responsibilities known and applied			
1.3 Appointment of key safety personnel			
Safety manager			
Role of safety manager			



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Behaviors & Human factors



- Auditor charateristics
- Major problems
- Vocabulary
- **❖** Attitude
- Questionning
- Traps to avoid



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Auditor Characteristics



To get along well with other staff (To be respected)

Enquiring & logical minds

Prepared to undertake lengthy investigations

To remain Objective and not Subjective or "opinionated"



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Major Problems with Auditing



Auditors not given direction by Management

Auditors viewed as a "Police Force"

Auditors believe that they are an elite group of "Quality or Safety Specialists"

Management and staff hide facts from the auditors



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Vocabulary

Use a vocabulary clear and in accordance with the language used by auditees.

❖ Avoid audit jargon.



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Auditor attitude

❖ The auditor must know how to listen:

- He must be attentive
- > He must be silent and does not interrupt the auditees
- He must look at his interlocutor
- He must not impose his ideas
- He must not give orders

An auditor must :

- Structure his message
- Ask only one question at a time
- > Not reading a questionnaire
- Speaking a comprehensive language
- Being calm, courteous, polite
- > Showing humor





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Auditor attitude



❖ The auditor must know how to be:

- Curious,
- Pedagogue by encouraging his interlocutor,
- Opportunistic knowing how to bounce on a track he had not planned to follow
- Malignant exploiting a silence where he expects a structured response (wait 9s before speaking again).

- He must respect the time slots defined in the audit planning.
- Everything that is observed by an auditor is confidential.



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Auditor attitude: records



- ❖ Auditors should review some documents (records) during interviews with the auditees.
- ❖ In a first step it is necessary to ask auditee where is one information without naming the document to see if the auditee knows the document.
- ❖ This makes it possible to see if the auditee knows where the information is and knows how to find the document.
- ❖ Secondly, if the auditee does not know where the information is, the auditor can name the document. It is possible to leave some time to find a document (after the next interview, end of day ...).
- The documents reviewed are returned to the auditees at the end of the interview.



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Auditor attitude: records



- **Example:** The safety responsibilities are contained in a decision signed by the CEO with Ref JJ / MM / YYY ABC.
 - > 1st question: what are your safety responsibilities?
 - 2nd question: in which document are your safety responsibilities?
 - > 3rd question: do you know the decision of CEO Ref JJ / MM / YYY ABC? 4th question: can you show me this document?



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Open, closed, targeted questions

❖ Open question:

- Can you describe your job?
- Can you describe your department activities?

Closed question:

- Are you member of the safety management review?
- Are you doing internal audits?

❖ Targeted question:

How can you bring proof that all reported safety events are handled?



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Other questions

❖ Investigative questions: How, Who, What, Why, How many

Alternative questions:
Of these 2 indicators which one do you use?







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An interview should always start with open questions that allow the auditee to speak.

The questions should be linked according to the funnel technique shown on the right.

Open questions

Questions

Investigative questions

Alternative questions

Targeted questions

Closed questions





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Misrepresentation



- ❖ In some cases, it may be interesting to rephrase what the auditee has just said by exaggerating what he said.
- ❖ Negative reformulation (If I understand correctly, you never do a safety management review (it's wrong and the auditor knows it).
- ❖ Positive reformulation (So, you treat all the safety events in the prescribed time (that's wrong and the auditor knows it).

❖ In these 2 cases wait for the auditee reaction.



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Seize opportunities ...



- **❖** Approximations: in general, in principle, normally, a little, often, I do like that, in these cases we should...
- ❖ Mistakes: the documents that are managed, the events that are treated, the ACAPs that are followed, there is a useless procedure, it is written but we do not do it ...
- ❖ In case of such approximations or mistakes you must ask questions until you get all the answers (empty questioning).
 - ✓ Concretely that means ...
 - ✓ Which translates to ...
 - ✓ Which means?
 - ✓ Which has the consequence ...
 - ✓ And...



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Forbidden questions

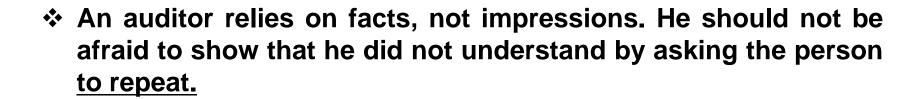
Some questions are «forbidden»:

- Question outside the audit perimeter because of loss of time and efficiency.
- Hostile, aggressive question against the person audited or another.
- Advice : why don't you do it like that.
- ❖ Double, triple ... questions. Auditor ask a lot of questions without waiting answers.



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End interview



❖ After the exchanges between auditor and auditee a <u>consensual</u> <u>diagnostic</u> must be shared.

❖ Propose to summarize :

- Can I summarize what was said?
- Can I rephrase what has been said?





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End interview

- ❖ Do not forget to ask for improvement proposals from the auditee :
 - If you had a magic wand, what would you do ?!
 - > The problem would be solved if ...

❖ If necessary, you must plan another slot time for a new interview.





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The auditee does not speak

You have to put him at ease and remind him that the audit concerns the function and not the individual.

Traps to avoid: behavior of auditees

- > Try to use humor ...
- > Try asking him to talk about his work, use open questions.

The auditee talks too much, does not answer the questions asked!

- ➤ It may be voluntary to avoid too many questions... The auditees can be auditors themselves....
- It is imperative to regain control very quickly and ask closed questions.



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Traps to avoid : behavior of auditees



The auditee responds constructively to all questions.

Ask more and more closed questions.

The auditee is haughty, assertive, he challenges the auditor.

- Test his comprehension, ask difficult questions.
- > Reformulate.



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Traps to avoid: behavior of auditees



