



NAVIGATING REGULATOR EXPECTATIONS FOR  
MANAGEMENT SYSTEMS SERIES

# Help Guide 1: Know the Basics

Process Documentation, Implementation  
and Establishment



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# Overview

**Based on our experience working with clients and regulators, there are certain areas across industry that cause confusion relating to management systems. *Through this 3-part series, we will outline the three most common deficiencies we have seen, and offer insight on opportunities for improvement.***

## **Deficiency 1: Process Development, Implementation, and Establishment**

Regulators like the Canada Energy Regulator (CER) and provincial agencies have specific requirements set out for management system development and implementation, whether it be for a general operations system or a safety and loss management system.

**These regulatory bodies require a management system be in place and have very specific expectations for the design and implementation of the systems required.** These expectations can be difficult for organizations to navigate. Reviewing and interpreting the definitions behind the common areas of confusion can help companies understand what exactly is expected, eliminating any uncertainties. We have found that the terms defined by the CER in relation to management systems can provide strong general guidance for both CER-regulated companies and companies regulated by other bodies.

**This FREE Help Guide provides answers to common questions, such as:**

- What is the difference between a program, process and procedure?
- What is the difference between developed and established?
- What is the difference between implemented and established?
- How can I show the regulator I am actually compliant with what is required related to processes?

# THE BASICS: Key Definitions

Knowing the difference between the following three terms based on the CER definitions, is a key step to enable your ability to demonstrate compliance to the regulator.

	CER Definition ( <i>source: CER Audit Guide</i> )	What you need to know
<b>Program</b>	"A documented set of processes and procedures designed to regularly accomplish a result as well as information outlining how plans, processes and procedures are linked; in other words, how each one contributes to the result."	A program is all of the processes, procedures and other supporting documents that define how a program topic is managed and how the various pieces work together to achieve the end result. <i>Does your company clearly define all components of a program?</i>
<b>Process</b>	"A documented series of interrelated actions that take place in an established order and are directed toward a specific result."	A process outlines the specific <b>activities</b> required, often through a workflow diagram, with responsibility and hand-off clearly defined. <i>Typically, a process is best defined with a process flow diagram, that may be embedded in other program documents.</i>
<b>Procedure</b>	"A documented series of steps followed in a regular and defined order thereby allowing individual activities to be completed in an effective and safe manner."	A procedure outlines the way of doing something – it has the <b>tasks</b> required to complete an activity documented in a sequential order. <i>All companies have procedures in some shape or form, but they may be incomplete or poorly implemented.</i>

## TIPS TO IMPROVE

Processes in particular seem to be the area where there is the most misalignment between regulatory bodies and industry. In practice, we have encountered many companies who have processes in place, but they are not formally documented. Despite the processes existing and working in their current state, the lack of documentation can result in non-compliance with regulator expectations. **Taking the time to document processes helps you understand, refine and enhance your existing workflows, which can improve effectiveness and adoption across the organization!** Companies reacting to regulator pressure often experience rushed implementation and poor suitability for end users as a result. Being proactive in documenting how you do business helps enable proper impact analysis and internal stakeholder engagement activities, which are vital pieces to ensuring programs and processes are suitable for end users.

# THE BASICS: Document Life Cycle

WHAT SHOULD YOU AS A COMPANY HAVE IN PLACE AT EACH  
PHASE OF THE DOCUMENT LIFE CYCLE?



## DEVELOP

Program documents meet regulatory requirements **are prepared in the company's format.**



## IMPLEMENT

Programs **have been approved, endorsed, and communicated** to the organization. **Training** has been provided and **use has been demonstrated.**



## ESTABLISH

Program documents are used regularly and consistently and **have been in use for a minimum of 3 months.**



## MAINTAIN

Ongoing **checks occur and are recorded** to ensure program documents meet regulation, leading to **continuous improvement.**

For further support, please **SEND US AN EMAIL** so we can continue the conversation and help you navigate through regulator expectations for Management Systems.



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