Assurance System Report

2018

Version: 1.4

Approval date: 1 October 2017

Amended dates: 20 March 2018

Official Language: English

[In case of inconsistency between translated versions, reference shall default to this official language version]

Amendments:
Supersede v. 1.1: 11 August 2014: page numbering and minor text changes.
Supersede v.1.3: 17 August 2015: new format template from ISEAL
Supersede v. 1.3 20 August 2017: Corrective actions on public information from ISEAL.
Superseded v. 1.3 March 2018: update accessibility of information on Oversight (section 4) with links to other documents.
1. **Assurance System Structure - overview:**

In 2015 certification, verification and auditing activities were spun off into a new structure "GEO Certification Ltd". This is to increase distance between the standard setting and programmatic activities of GEO Ltd and certification decision-making by GEO Cert. Ltd, and to allow greater space for rigorous, independent oversight.

**Fig. 1: Certification Process and Decision-making:**

![Diagram of Certification Process and Decision-making](image)

* Taken from A4 GEO Process Flow

**List of Standards being assessed under the assurance system:**

- GEO Certified® for golf club and course management - open to any golf facility worldwide that has been in operation for more than one year. ([http://www.golfenvironment.org/assets/0002/8597/Evaluation_Criteria_2015.pdf](http://www.golfenvironment.org/assets/0002/8597/Evaluation_Criteria_2015.pdf))

**ISO compliance:**

As accepted by ISEAL's Assurance Code developed with extensive stakeholder input around assuring voluntary sustainability standards, GEO Cert. Ltd.’s Assurance systems and the GEO Verifiers are not required to be officially compliant with ISO 17065/ISO 17011, although an audit was carried out in 2014 to ensure the GEO systems comply with the intent of ISO 17065.

**List of current approved verifiers:** [http://www.golfenvironment.org/about/support_network](http://www.golfenvironment.org/about/support_network)
Stakeholder Engagement:
Internationally there is currently no formal stakeholder involvement in the assurance process. In certain countries looking at regionalisation (e.g. Holland) the Golf Association may have more input on the assurance process and oversight of the GEO Verifiers. Any stakeholder has the right to comment or complain on individual certification decisions, processes or programmes. The Complaints and Appeals procedure is available publically:
http://www.golfenvironment.org/assets/0000/1155/A17_GEO_Complaints_Procedures_v2_Approved_JUNE_FINAL.pdf

GEO - improvements in the assurance system
GEO’s Management Team has established procedures to review its management systems at least once per year, to ensure their continuing suitability, adequacy and effectiveness. The Assurance System was peer-reviewed in 2014 by MSC as part of the ISEAL membership process. Following this, the decision to create GEO Certification Ltd. was taken and further improvements to the assurance system were being developed and rolled out during 2015 – 2016. With the launch of the new data management system, OnCourse® a more extensive training and communications plan for data input by the golf facility and verification will start in Q42017.

Reviews also involve the Advisory Council – a multi-stakeholder governance body.

2. Personnel Competence
Verifier competence and experience:
- Criteria for accepting verifiers: http://www.golfenvironment.org/assets/0000/3284/the_geosa_network_UK.pdf
- All GEOSA carry at least one recognized academic and/or vocational qualification in an environmental or sustainability based field. These include:
- They also must have at least 4 years practical experience in one of the following working environments:
  - Environmental and sustainability based consultancy / NGO / education and research institutions, Corporate responsibility based duties in business, Land management, including estate management, forestry and countryside protection, Government agencies with relevant environmental and sustainability focus.
- Candidates are interviewed, trained and pass an exam before being able to become part of the GEO verifier network. The verifier password protected area on the GEO website, Highrise platform and the verifier newsletter has training, guidance and information to continually update skills and knowledge.
- Every verifier report is checked and evaluated by a GEO Cert. Ltd member of staff.
- Every fifth audit a verifier carries out is peer-reviewed by another verifier in the network. This allows for further evaluation and calibration of performance.
• A Code of Conduct is signed by each verifier accepted into the network, and describes reasons and process for disciplinary proceedings.

3. Assessment

Assessment Process:
• Each golf facility that has finalised all self-reporting in the OnCourse® web-based programme, OnCourse® has the data and information checked by a GEO Cert. Ltd. member of staff and the golf facility then appoints the third-party verifier for an audit.
• The golf facility once certified has three years to fulfil Continual Improvement Points, when they will be audited against the GEO Recertified® Criteria.
• GEO does not use audit teams or conduct group audits.
• The GEO Certified® criteria have "must" and "should" criteria. To become certified a facility must conform to all "must" criteria.

Knowledge Sharing:
• Knowledge sharing is an important part of the GEO Verifier’s defined role. GEO encourages genuine continual improvement; an important element of the Verifier’s role is to help clubs better understand priorities, weaknesses and identify practical next steps.
• One element of the Verifier evaluation report includes a templated action plan for improvement (Continual Improvement Points) and all advice given must be presented in the Verifier report and stored on the GEO website for transparency, and this is also then used as a basis for recertification.

Decision-making Mechanism:
• The verifiers are trained to check and supply all relevant information and photographic evidence against the set evaluation criteria in the template provided (OnCourse® web programme) and the meetings and "areas to check" during the audit.
• The Verifier guidance notes on evaluating club performance outline the performance grading weighting system to be used to show level of compliance and what supporting evidence should be supplied, to guide and help standardize a verifier’s potentially subjective analysis the certification system requires.
• The criteria include essential ("must") and desirable ("should") criteria that must be met and guidance is provided to verifiers on how to grade each element (‘Performance Grading System’ - significant good practice, notable, room for improvement and red list issues). Red list issues are those where the verifier identifies a club demonstrating lack of interest and understanding of sustainability or where there are no (or few) examples of practical implementation of sustainability projects during the assessment.
• The GEO Performance Grading system outlined above results in the recommendation by the GEOSA of ‘Award’, ‘Certification pending’ (e.g. if there a some outstanding "must” criteria to be fulfilled or further evidence provided) or ‘qualified refusal’ (rare but possible).
• There are no absolutes in the OnCourse® system due to the variances between golf courses, but all data submitted by the golf course is verified in the audit report and cross-checked and analysed as a whole by GEO Cert. Ltd for the final certification decision. (The reports are made publically available on the GEO website for full transparency once the club is certified).
Remediation and Sanctions for non-conformities

The process by which certification is awarded is covered in the Standard Monitoring Procedures (A7):

1. In cases of continued unresolved issues, the GEO Cert. Ltd staff member refers case to GEO Managing Director (in the first instance) and subsequently GEO Chief Executive Officer for opinion.
2. MD or CEO may advise on consultation with qualified representatives of GEO Advisory Council, or other members of the Verifier Network.
3. Based on this feedback, the final position (on certification award or certification pending) to be taken by CEO.
4. Club and verifier are notified [potential for Club to initiate Complaints and Appeals procedure A17].
5. All club Continual Improvement Points, initial submissions and Verifier report are recorded and stored in the GEO website.

Red list issues result in certification being ‘pending’ or in extreme cases refused. Through the verification report template, GEO enables GEOSA to draw distinction between single, discrete and resolvable non-compliance issues, and more serious failures to demonstrate that sustainability is embedded within the decision-making of the club.

**Oversight** of GEO Cert. Ltd.'s assurance system is currently by the Advisory Council, through peer-reviews and system reviews. There is no formal oversight model using an external ISO-conforming oversight body. Proxy accreditation is not used by GEO. Further information on Oversight can be found in Standard Monitoring & Oversight Procedures as well as Governance & Oversight.

4. **On-going Scrutiny**

**Description of market surveillance and repercussions of fraud**

Any fraudulent activity would be realised through a public complaint and/or notification by a stakeholder (such as the National Golf Federations, the GEOSA working on the ground, etc.).

The GEO OnCourse® Terms and Conditions outline the use of GEO logos and trademarked (e.g. OnCourse®, GEO Certified®, etc.), reasons and process for terminations due to fraud or misrepresentation (http://www.golfenvironment.org/oncourse_terms_and_conditions).

Fraud or improper claims by GEOSA’s is covered in the GEOSA contract, handbook and in the Complaints and Appeals Procedure.

GEO tracks the use of its logos and materials through market surveillance online, and complaints or comments received from the public or media and through its relationship with partners.

Documents referenced in this document are available on the GEO website: www.golfenvironment.org