

# Oversight & Assurance Management System Overview

ENSURING CREDIBLE EVALUATION, TRACEABLE PERFORMANCE AND  
ACCURATE CLAIMS FOR GOLF AND SUSTAINABILITY

VERSION 1.4

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## 1.0 ABOUT THIS DOCUMENT

This document is designed to provide an accessible introduction into the broad structure and workings of GEO's Oversight and Assurance Systems – which is designed to ensure the consistent and credible evaluation of performance across defined sustainability action areas and indicators relating to the award of GEO Certified® status for golf facilities, developments and tournaments.

These management systems are outlined together to define the responsibilities distinct between GEO Foundation and GEO Certification Ltd. While these organizations are separate entities, it is critical that they exist symbiotically to strive toward the same objectives.

The document includes updated content and corrective actions resulting from ongoing monitoring and evaluation of system performance over recent years; as well as some further adaptations in areas such as auditing.

The final section of the document outlines some of the forward-looking analysis of the system, and potential areas for further development of our Oversight and Assurance Systems.

## 2.0 INTERNATIONAL STANDARDS ALIGNMENT

### 2.1 Addressing the ISEAL Assurance Code

The ISEAL Assurance Code is designed to ensure that ISEAL code-compliant systems are structured and operate in a way that ensures:

- Efficiency and Improvement
- Rigor and Impartiality
- Value and Accessibility

By aligning our OAMS directly to the principles and criteria of the ISEAL Assurance Code, GEO Foundation and GEO Certification Ltd aim to ensure that these three important principles are fulfilled in practice – each being seen as vital in ensuring the system generates real social and environmental outcomes, as well as trust and confidence around communications and claims.

### 2.2 Credibility Principles

The GEO Oversight and Assurance Management System (OAMS) is a central component of GEO's overall sustainability system, operating closely alongside, and helping to ensure meaningful connections between:

- Stakeholder-led standard-setting (ISEAL Standard Setting Code)
- Reliable monitoring, evaluation and reporting of impacts and claims (ISEAL Impacts and Assurance Codes)

Importantly, the OAMS is a vital part of ensuring that GEO continues to work both to the spirit and letter of the ISEAL Credibility Principles – namely:



<b>Sustainability</b>	Standards scheme owners clearly define and communicate their sustainability objectives and approach to achieving them. They make decisions that best advance these objectives.
<b>Improvement</b>	Standards scheme owners seek to understand their impacts and measure and demonstrate progress towards their intended outcomes. They regularly integrate learning and encourage innovation to increase benefits to people and the environment.
<b>Relevance</b>	Standards are fit for purpose. They address the most significant sustainability impacts of a product, process, business or service; only include requirements that contribute to their objectives; reflect best scientific understanding and relevant international norms; and are adapted where necessary to local conditions.
<b>Rigour</b>	All components of a standards system are structured to deliver outcomes. In particular, standards are set at a performance level that results in measurable progress towards the scheme's sustainability objectives, while assessments of compliance provide an accurate picture of whether an entity meets the standard's requirements.
<b>Engagement</b>	Standards-setters engage a balanced and representative group of stakeholders in standards development. Standards systems provide meaningful and accessible opportunities to participate in governance, assurance and monitoring and evaluation. They empower stakeholders with fair mechanisms to resolve complaints.
<b>Impartiality</b>	Standards systems identify and mitigate conflicts of interest throughout their operations, particularly in the assurance process and in governance. Transparency, accessibility and balanced representation contribute to impartiality.
<b>Transparency</b>	Standards systems make relevant information freely available about the development and content of the standard, how the system is governed, who is evaluated and under what process, impact information and the various ways in which stakeholders can engage.
<b>Accessibility</b>	To reduce barriers to implementation, standards systems minimise costs and overly burdensome requirements. They facilitate access to information about meeting the standard, training, and financial resources to build capacity throughout supply chains and for actors within the standards system.
<b>Truthfulness</b>	Claims and communications made by actors within standards systems and by certified entities about the benefits or impacts that derive from the system or from the purchase or use of certified product or service are verifiable, not misleading, and enable an informed choice.
<b>Efficiency</b>	Standards systems refer to or collaborate with other credible scheme to improve consistency and efficiency in standards content and operating practices. They improve their viability through the application of sound revenue models and organizational management strategies.

## 2.3 Theory of Change – Sustainable Golf

Our OAMS is also a vital component of the overarching GEO Theory of Change for advancing sustainability in and through golf. Working in close harmony and synchronized with the GEO Standard Setting and M&E of Impacts activities, the OAMS ensures the real-world impact of standards are consistently evaluated and measured; that the necessary supporting evidence and data is tracked; and that this rigor and accuracy underpins all following communications and claims, from certified entities, and including industry knowledge-sharing and wider promotion of results.

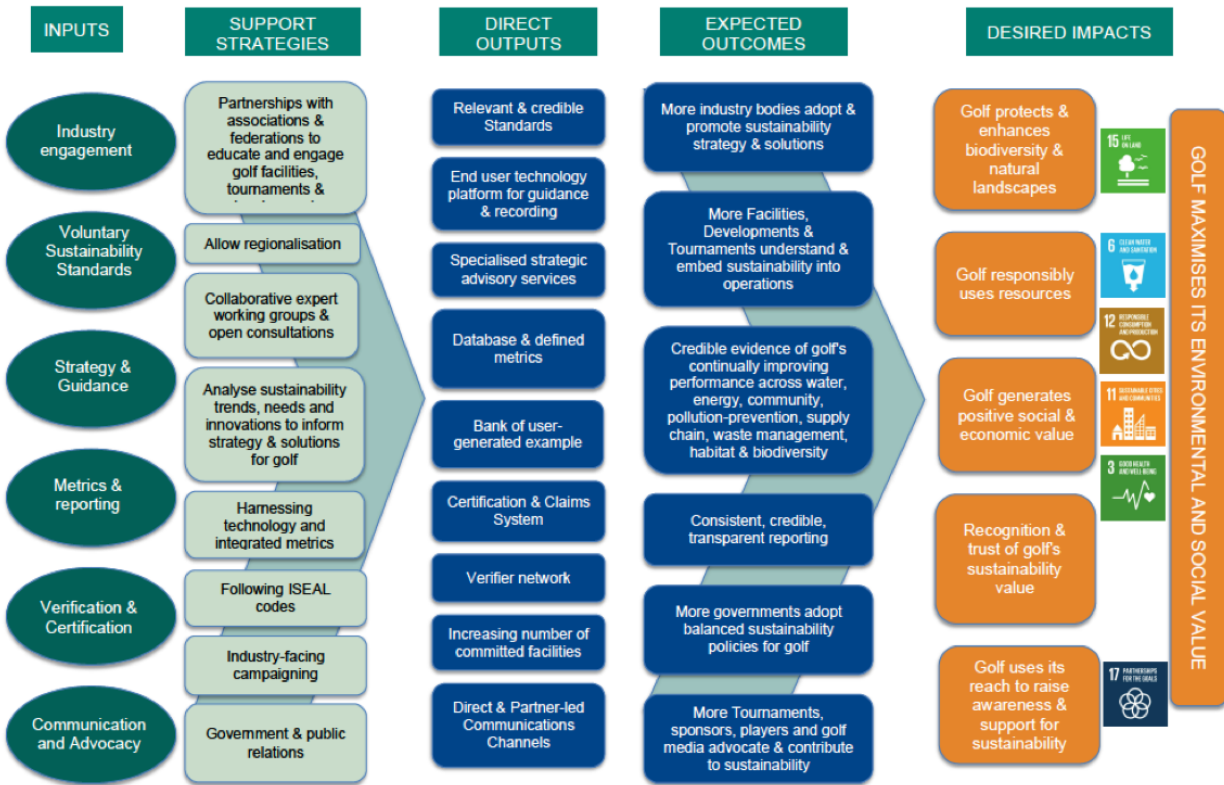


Figure 1: Overview of GEO Theory of Change

## 2.4 ISO 17011 Compliance

Although a formal accreditation with ISO is not required, the GEO Foundation continues to conduct scheduled self-assessments against the latest versions of the ISO/IEC 17011 international standard.

This is done in order to ‘cross check’ the strengths and weaknesses of key aspects of our oversight structure, and also more detailed processes for the recruitment, development, operations and evolution of approach to verification / auditing and validation.

The most recent self-assessment against the ISO/IEC 17011 standard was undertaken in Q1 2021.

### SUPPORTING DOCUMENTS

- ISO/IEC 17011 – GEO Self-assessment summary, latest version Q1 2021



### 3.0 SYSTEM COMPONENTS

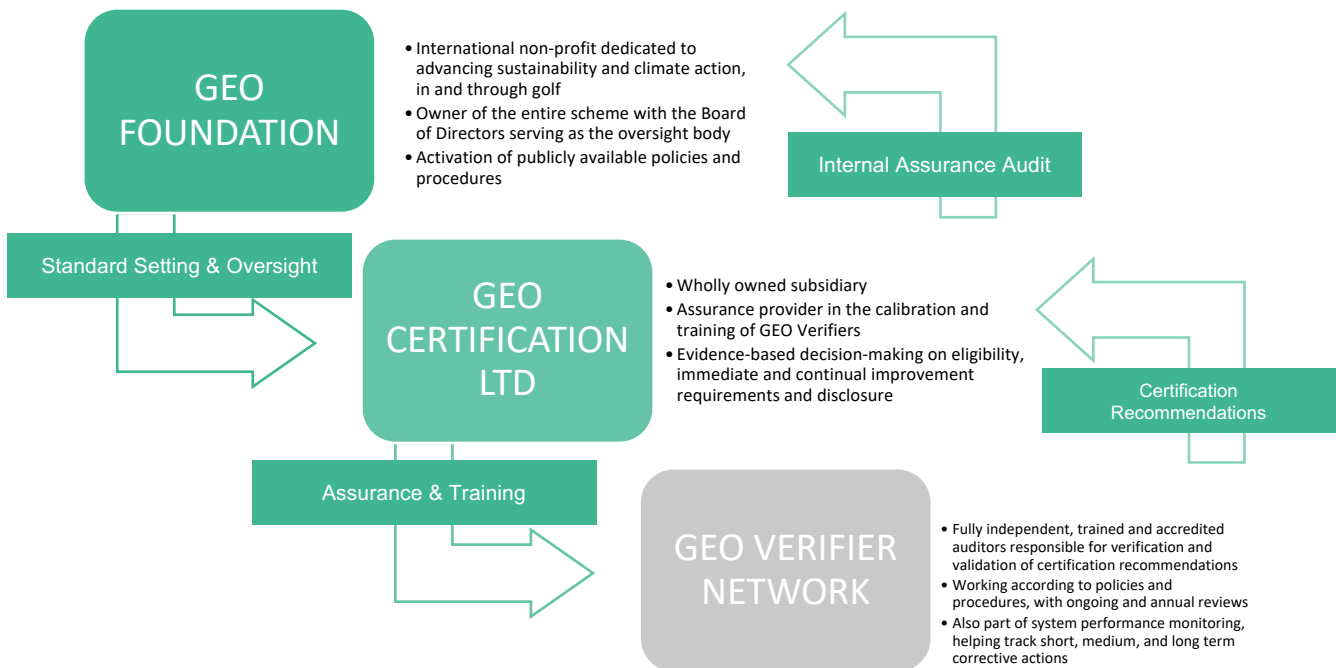


Figure 2: GEO System Components

### 3.1 Ownership and Oversight - GEO Foundation for Sustainable Golf

GEO Foundation for Sustainable Golf is an international non-profit headquartered in Scotland. The organization is legally registered in Scotland as a Company Limited by Guarantee, with Articles and Memoranda of Association that ensure the organization’s activities and allocation of funds are entirely mission driven – for the purposes of accelerating sustainability in and through the sport of golf.

#### 3.1.1 GEO BOARD OF DIRECTORS

GEO Foundation is led by a group of volunteer Directors, who have no shareholding in the company, nor rights or ability to access shares or revenues, beyond reasonable expenses. The Board of Directors serves as the oversight body to all aspects of the GEO Certified® labelling system, including ISEAL Credibility Codes covering standard-setting, monitoring and evaluation of impacts, risk assessment and assurance management review.

*SUPPORTING DOCUMENTS*

- GEO Foundation Incorporation Certificate
- Articles and Memorandum of Association
- Insurance Certificates & Accounts
- Data Governance Policy
- Personnel Competencies
- Complaints, Appeals, and Exceptions Policy

### 3.2 Certification Assurance Body - GEO Certification Ltd

GEO Foundation has formally delegated assurance implementation duties to GEO Certification Ltd, responsible for executing all approved policies and procedures in relation to assurance. GEO





Certification Ltd takes responsibility for ensuring the quality and integrity of the assurance activities that are undertaken by a network of accredited verifiers (i.e. certification auditors).

GEO Certification Ltd is a wholly owned subsidiary of GEO Foundation. It has been established with the sole purpose of being GEO's Assurance Management System. A signed Memorandum of Understanding sets out the terms of the relationship between the organizations, and the defined role and duties of the subsidiary.

GEO Certification Ltd employs a team of staff operating in various aspects of assurance and is guided by a Certification Board. Any members of GEO Foundation's Board of Directors that also sit on the Certification Board will not have influence the decisions of certification awards, refusals, or exceptions. Crossover between director roles is permitted to promote continuity between the feedback loops of assurance performance from GEO Certification Ltd and any subsequent oversight of policies or the standard from GEO Foundation.

#### *SUPPORTING DOCUMENTS*

- *GEO Certification Ltd Incorporation Certificate*
- *GEO Certification Articles of Association*
- *GEO Foundation / GEO Certification MoU*
- *Personnel Competencies*

### **3.3 Certification Auditors – GEO Verifier Network**

To promote the integrity of certification audits, a network of third-party accredited verifiers are used to review and conclude the results of any assessment. While the operations of this network are assured by GEO Certification Ltd., the processes for which they operate are established by the scheme owner and oversight body of GEO Foundation.

#### 3.3.1 Verifier Eligibility

All GEO Accredited Verifiers (i.e. auditors) carry at least one recognized academic and/or vocational qualification in an environmental or sustainability-based field. These include:

- Physical, biological and social sciences
- Environmental Management Systems
- Conservation and Countryside Management
- Landscape Architecture, Urban and Land Planning
- Resource Management
- Environmental Engineering
- Agronomy, irrigation, and drainage
- Golf Course Management / Architecture

All verifiers 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

Ineligibility for verifiers includes:

- Working under the direct, remunerated employment of an association or governing body in the sector (for risks of undue influence on objectivity of verification); working for a company that is



primarily involved in selling products into the sector (for risks of bias towards commercial interests particularly in defining required Immediate / Continual Improvement Points for applicants).

- In addition, close attention is paid to any applicant that whilst they have the technical qualification and experience to qualify, may have a position in the industry (e.g. as a part of full-time practitioner in a related business). Accreditation of such individuals may be possible but receives greater scrutiny and may result in specific boundaries on the types and geographies of verification that are permitted. Allowances are often made in this category where, for example, verifiers are needed but there is an initial dearth in available capacity.

### 3.3.2 Verifier Accreditation

Candidates are interviewed, trained and required to pass an exam before being able to become part of the GEO Accredited Verifier network. Any candidates that advance past this initial stage are required to sign a Contract and Code of Conduct, which commits them to following defined processes and behaving in a professional manner.

Once onboarded, the verifier will be given access to the password-protected area on the online platform, OnCourse® and added to the verifier newsletter mailing list for ongoing information on training, guidance and notifications of any changes to policies or procedures. For their first audit, a new verifier must shadow an on-site audit with a verifier who has conducted at least five solo site visits.

In managing the network of Accredited Verifiers and its operations, GEO Certification Ltd also ensures that no verification activities are outsourced to non-accredited third parties.

#### *SUPPORTING DOCUMENTS*

- GEO Verifier Handbook
- Verifier Code of Conduct

### 3.3.3 Verifier Operations

Once an applicant has finalized all self-reporting via GEO's OnCourse® web-based programme, GEO Certification Ltd is responsible for conducting a pre-check for completeness and accuracy. If necessary, pre-verification screening feedback is provided to the applicant requesting further data and information on mandatory practices. The appointment of the verifier is also screened by GEO Certification staff to ensure there are no conflicts of interest.

Verifier and applicant will keep GEO Certification Ltd informed at all times of coordinating the audit with GEO Certification Ltd having the authority to override any components of the verification that are not in-line with current policies and procedures, including:

- Date and time of the audit (i.e. not falling within the window required for certification)
- On-site or remote, depending on risk assessment carried out in relation to:
  - Location of the facility (country, degree of remoteness);
  - Complexity (scale of entity, climate, local environmental and social context etc.);
  - Other material issues (reputational, levels of visibility including if the venue is host to a high-profile event, age of facility, history and background).
  - Number of years of data provided in OnCourse® and/or number of years certified.
- Use of an audit team or conducting group audits (i.e. when verifiers are being shadowed by other verifiers, or where a group of applicants in a region are due to be audited at the same time and a verifier has to travel reasonable distance to undertake)

Following the on-site or remote audit, the verifier will submit their certification recommendation and reasoning to GEO Certification Ltd for review (see Section 4.1.1).



### 3.3.4 Verifier Professional Development & Training

Every fifth audit that a verifier carries out is peer-reviewed by another verifier in the network. This allows for further evaluation and calibration of performance. GEO Certification Ltd keeps a record of verification strengths and weaknesses throughout the year - annually reviewing and appraising those to guide ongoing system improvements.






Post-verification, an evaluation of lessons is undertaken between GEO Certification Ltd staff and the verifier to identify future risks and specific challenges, points of system and operational improvement that might be identified. Knowledge-sharing is an important part of the verifier's defined role; GEO Certification Ltd encourages sharing of experiences amongst verifiers and offers training to promote best practices and procedures.

#### *SUPPORTING DOCUMENTS*

- GEO Verifier Handbook



## 4.0 SYSTEM PROCESSES

-  **GEO FOUNDATION**  
Scheme Owner
-  **BOARD OF DIRECTORS**  
Oversight Body
-  **GEO CERTIFICATION LTD**  
Assurance Providers
-  **CERTIFICATION BOARD**  
Assurance Body
-  **VERIFIER NETWORK**  
Certification Auditors























		PROCESSES				
		Standard Setting & Policy Definition	Management Review	Annual Internal Audit	Complaints & Appeals	Certification Decisions
ROLES	Responsible					
	Accountable					
	Supporting					
	Informed					
	Consulted					

Figure 3: RASIC Diagram of Key OAMS Processes

### 4.1 Certification Decision-Making

#### 4.1.1 Verifier Recommendations

Accredited verifiers are trained to check applicant performance, and supply all relevant documentation and photographic evidence, against the set content and structure of the Verification Record, which is synchronized to both the Standard and OnCourse® programme content and materials.

To better standardize the results of verification, levels of Criteria Satisfaction have been developed to identify strengths and opportunities for improvement. These levels of satisfaction also provide greater guidance on the certainty with which a verifier can recommend certification or not. Greater detail on these thresholds and their implications can be found in the Verifier Handbook and Verification Record.

Regardless of the verifier’s decision to recommend certification or not, every Verification Record is evaluated by a GEO Certification Ltd. It is then the decision of GEO Certification Ltd to uphold or refute the verification recommendation. If the recommendation from the verifier is not upheld by GEO Certification Ltd, additional evidence and reviews may take place to reach a consensus but ultimately the ability to award or refuse certification belongs to GEO Certification Ltd.

#### SUPPORTING DOCUMENTS

-  GEO Verifier Handbook
-  Verification Record Template

#### 4.1.2 Monitoring and Remediation of Non-Compliances

Any opportunities for continuous improvement are included in the certification report (see Verifier Handbook for more information). However, if mandatory practices are not sufficiently implemented (non-



compliances) certification will be marked as 'pending' or in extreme cases 'refused'. Through the verification report template, GEO Certification Ltd enables verifiers 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. This aligns well with the performance and systems-based mix of criteria in system standards.

GEO Certification Ltd maintains a Monitoring & Evaluation System to help ensure compliance to the Voluntary Sustainable Golf Standard and the promotion of sustainable golf. Therefore, there are four core elements covered by GEO Certification Ltd in its monitoring procedures:

- Participation in the programme - registration and certification; and conversely, the cessation of claims and suspensions
  - Expirations are tracked on a monthly basis with proactive efforts for reengagement beforehand but implications for expiration (i.e. cessation of claims) are also shared
  - Automated alerts for key terms related to GEO Certification and OnCourse are used to supplement regular reviews of publicly available claims
  - Any stakeholder that wishes to report a potential incident of misrepresentation or corruption can use the same mechanisms as Complaints and Appeals (see Section 4.1.3)
- Club's performance, quantitative and qualitative, against indicators;
- GEO Certification Ltd. Determinations – identifying and recording certification highlights and continual improvement points; and
- The effectiveness of independent verifiers (i.e. auditors) in assurance and supporting continual improvement.

To monitor ongoing performance and impacts, participants of the certification programme are required to use the OnCourse® platform, which allows for annual tracking of data and key practices. Accounts are periodically reviewed for quality and completeness and GEO Certification Ltd will follow up on any inconsistencies. Additional evaluation is completed through annual, national, and subject-matter reports. The use of OnCourse® as a tool and its metrics supplement data-cleaning best practices and the Claims Policy established by GEO Foundation.

#### *SUPPORTING DOCUMENTS*

- GEO Verifier Handbook
- GEO Monitoring and Evaluation Procedures
- GEO Claims Policy

### 4.1.3 Complaints, Appeals, and Exceptions

GEO Foundation takes its responsibilities as a certification scheme owner, extremely seriously. The goals are to deliver programmes and certification in ways which:

- Deliver direct value to participants
- Evaluate and make judgements on participant performance fairly, objectively and consistently
- Seek to drive continual improvement and tangible positive impacts – short to long term
- Meet local to global stakeholder expectations, particularly around confidence and trust in relation to how pressing social and environmental challenges are being addressed, and claims entities are making

Whilst our work is generally well-received – not least as a result of the mission-driven, open and collaborative way it is undertaken, and for the stated goals towards which it is directed, we also make sure that whenever any participant or stakeholder would like to express a concern or grievance, submit a complaint, or lodge an appeal – that they are assured that it will be duly heard, respected and addressed.

In order to follow through on these commitments, GEO Foundation established a formal Complaints and Appeals Procedure, first approved in 2014. The Directors of GEO Certification Ltd (Board of Certification



members) are responsible for the review and judgement on any of these instances raised in the form of a complaint, an appeal, or an exception.

#### *SUPPORTING DOCUMENTS*

- GEO Complaints and Appeals Procedure

## **4.2 Internal Audit**

### 4.2.1 Verifier Scoring and KPI Evaluation

The continuous monitoring of verifier performance and a scoring of their performance is done on an annual basis. The results of this internal audit are shared with GEO Foundation to share learnings of the Quality System and further drive opportunities for improvement. Some of the Key Performance Indicators that are tracked include:

- Number of evaluations per verifier
- Number of improvement points included in verification reports
  - Average per verifier
  - Average per assessment criteria (mandatory practices)
- Qualitative factors of verifier performance rated as Excellent, Good, OK, and Poor; for example:
  - Thoroughness of reports;
  - Timeliness of verification;
  - Turnaround time of report development; and more

### 4.2.2 Internal Audit Report

GEO Certification Ltd conducts an internal audit to show the alignment of processes to the procedures outlined by GEO Foundation. Verifier performance metrics and certification indicators are consolidated in a formal annual review, along with a checklist of policies and practices being followed. A summary of takeaways from the certification reports are summarized (i.e. assessment criteria with the highest average number of improvement points, number of certifications awarded by region, etc.). This report is reviewed by the Certification Board and ultimately shared with GEO Foundation and its Board of Directors as well.

#### *SUPPORTING DOCUMENTS*

- GEO Personnel Competencies
- Internal Audit Reports

## **4.3 Risk Assessment & Management Review**

While the assurance processes of GEO Certification Ltd are defined by GEO Foundation, the oversight procedures of GEO Foundation are informed by and designed to evaluate the effectiveness of the assurance body. GEO Foundation has established procedures to review its oversight management systems at least once per year, to ensure their continuing suitability, adequacy and effectiveness. Two opportunities for this evaluation include an annual Risk Assessment and Management Review.

### 4.3.1 Risk Assessment

GEO Foundation staff evaluate the implementation of policies, procedures and people across the system, noting potential risks, weaknesses, and remedial actions. Although some will be addressed with immediate effect, some feed into longer term analysis and larger scale improvements. Each year GEO Foundation formally conducts a risk assessment to better forecast and anticipate potential challenges



facing the organization, its operations, or its objectives. The results are included in the Management Review report, which is delivered to the Board of Directors.

#### *SUPPORTING DOCUMENTS*

- GEO Risk Assessment, latest version

### 4.3.2 Annual Assurance Management Review

The members of GEO Foundation are responsible for the production of a Management Review Report each year. The purpose of this report is to at a high level assess that the policies allow for effective assurance to be provided by GEO Certification Ltd, and overall summarize the alignment of the organization to the policies and procedures defined. While the Management Review is a separate process, the Internal Assurance Audit is a direct input to this report, along with any identified complaints or appeals. Additionally, a Strength, Weaknesses, Opportunities, and Threats (SWOT) Analysis will be conducted, along with a review of project management performance metrics. The Board of Directors is ultimately accountable for reviewing the report and taking action to address any areas of improvement in standard development and policy-setting.

#### *SUPPORTING DOCUMENTS*

- GEO Management Review, latest version



## SECTION 5: GLOSSARY OF TERMS

Where applicable, the following terms were adapted from the definitions found within the ISEAL Assurance Code version 2.0 or other source if noted.

**Accreditation** – formal demonstration of the competence of certification auditors to conduct verification assessments

**Appeal** – request to reconsider the result of a decision-making process (e.g. certification decisions made by GEO Certification Ltd.)

**Applicant** – entity (e.g., facility, tournament, or development) seeking certification

**Assessment** – decision-making processes related to certification, including verification, data review, and report development

**Assurance** – demonstrate evidence that specified requirements relating to a process, system or body are fulfilled (adopted from ISO 17000)

**Audit (or Verification)** – systematic data review, observation of practices, interviews, and collection of relevant documents and records to assess conformance to standardized requirements (adopted from ISO 17000)

**Auditor (or Verifier)** – the individual responsible for executing the audit

**Board of Directors** – governance body appointed by GEO Foundation to guide the development of standards and policies towards the achievement of the organization's mission statement and objectives

**Certification** – recognition of conformance to a standard and its requirements

**Certification Board** – governance body appointed by GEO Foundation to ensure conformance with the policies and standards set by the oversight body and scheme owner and evaluate the quality of assurance provided through GEO Certification Ltd

**Claim** – assertion or statement regarding compliance to a standard or achievement of a given certification status

**Competency** – required skills, experience, and knowledge to fulfil a specific role

**Complaint** – formal grievance or statement of dissatisfaction regarding processes, experiences, or actions executed by GEO Foundation or GEO Certification Ltd

**Corrective Action** – plan designed to address a non-conformity or generally promote best practice

**Exception** – the exclusion of a specified requirement from a standard or policy from an audit in a given circumstance

**Facility** – a golf course, including but not limited to the golf grounds, maintained habitats, club house, and maintenance facility (see Claims Policy for restrictions)





**Non-Conformity (or Non-Compliance)** – failure of an applicant or certified entity to conform to the requirements of the standard

**Oversight** – Assessment of assurance provider’s demonstration of competence to carry out specific assurance tasks (e.g. Annual Assurance Management Review by GEO Foundation of GEO Certification Ltd’s performance)

**Scheme Owner (or Standards Owner)** –the organization responsible for the development of a standard and its associated processes, objectives, scope, and definition of conformance

**Stakeholders** – individuals or groups that may currently be or are potentially affected by the objectives and requirements of the standard and its certification

**Standard** – formal documentation of the criteria, guidelines, and processes related to the stated objectives, as either a voluntary application or intended for certification