Standard Monitoring & Oversight Procedures

Reference: A7
Version: 2.2
First Approved Date: 8 March 2013

Official Language: English

Standard Monitoring Procedures will be revised at least every 5 years

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

Amendments:
July 2014: updated for ISEAL Assurance member compliance
Jan 2015: updated with new Governance Structures (A3)
Oct 2016: clarification of verifiers training and recruitment
May 2017: Update with further verifier code of conduct elements & public information
Aug 2017: update with knowledge sharing during the audit and clarification of must & should criteria
Feb 2018: further clarification of Must & should criteria sanctions.

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Standards Monitoring Procedures
Overview

There are five core elements covered by GEO Certification LTD’s monitoring procedures.

1. Participation in the programme (registration and certification);
2. Club’s performance, quantitative and qualitative, against indicators;
3. GEO Certification LTD Determinations – identifying and recording certification highlights, continual improvement points;
4. The effectiveness of independent verifiers in assurance and supporting continual improvement;
5. And industry support for the standard and certification.

1. Programme participation

A running total of programme participation is kept, including tracking of the following:

- Length of participation in programme
- Activity and progress within the programme

Prompts and notifications from registration to certification are provided to participants throughout the programme, via the OnCourse® web programme (accessible to the golf club representative, GEO Certification LTD staff and the GEOSA). All electronic communication between the parties, related to OnCourse® programme content, participation and feedback, is securely recorded on GEO Certification LTD’s email communications system and/or via the Highrise web-based contact management system.

Every new registration is monitored by a GEO Certification LTD member of staff.

The GEO Certification LTD OnCourse® programme is available to all golf clubs worldwide that have been in operation for more than one year. The programme monitors sustainability outcomes across the golf course, in the clubhouse, maintenance facility and any other outbuildings on the course. GEO Certification LTD accepts registration from those clubs, which fulfill these basic criteria, can provide the required registration information and have the means and commitment to follow the OnCourse® programme. The criteria have been set to ensure a balance between assurance rigor and accessibility, and provide a means for a wide range of golf clubs to become engaged in a sustainability journey.

The golf clubs undertaking the OnCourse® programme contact a GEOSA directly from the directory available on the website, to perform the verification. The network of GEOSA is growing to represent most regions and competence/knowledge areas. Either the golf club will contact GEO Certification LTD if there is no GEOSA available locally or local GEOSA competence is not sufficient for their requirements, or the GEOSA will contact GEO Certification LTD to state they cannot undertake verification due to their lack of specific competence. In this case, GEO Certification LTD will endeavour to find the competence necessary through the network of stakeholders with which GEO works.

In the case of a golf course registering that has such specific features that GEO Certification LTD has no prior experience with which to evaluate it (e.g. location, based on new technologies, etc.), GEO Certification LTD will contact GEO LTD to reach out to the GEO stakeholder network, expert groups and if required, the Advisory Council to find the necessary expertise. Additionally those sites that are determined to be of “large scale and high sensitivity” may require peer review by others within the network of accredited verifiers.

There are strict protocols and guidance for the relationship between the golf club, GEOSA and the GEOSA’s other golf industry relationships, found in the GEOSA’s online guidance documents and within the Contract with Certification
2. Club performance

The GEOSA are trained to supply all relevant information against the set evaluation criteria in the template provided (OnCourse® web programme). The GEOSA 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 the GEOSA’s subjective analysis the certification system requires. There are no absolutes in the OnCourse® system (other than national / regional legal compliance and requirement to comply with all ‘Must’ Criteria) due to the variances between golf courses, but all data submitted by the golf course is verified in the GEOSA report and cross checked and analysed as a whole by GEO Certification LTD.

Each club’s performance against the GEO standard(s) is determined at the time the verification is conducted. The club is required to meet all of the Must criteria in the current standard(s) in place at the time of the verification (See section 3 below for detail on application of this policy). GEO Certification LTD confines its requirements, evaluation, review, decision and surveillance to those matters specifically related to the scope of certification. Approved changes and new requirements are communicated to clubs via email, GEO’s website, and online programme updates.

Changes made by a club between certifications are handled by GEO Certification LTD on a case-by-case basis, as continuous improvement (achievement of more Should criteria) is part of the certification renewal process (see also OnCourse® Terms and Conditions_ 3.0 on renovations). The majority of changes will be improvements and will not impact their current certification. If changes are made that are detrimental to the club’s ability to remain compliant with the standard(s) it will become evident and handled through the re-certification process conducted every three years to remain a GEO Certified® facility.

Any complaints of negative changes by the golf facility are handled through GEO’s Complaints and Appeals Procedures (A17).

Process of monitoring via Verifier Network

Preparation and Arrangement

1. Verifier reviews the documentation and data submitted by the interested party prior to onsite / remote verification.

2. Verifier makes an onsite visit, or arranges remote verification to the party applying for the ecolabel.

Onsite Visit

3. Tour of course (including boundaries and internal features), maintenance facility, clubhouse and other facilities accompanied by key staff.

4. Review and evaluate:
   a. Turf-grass species
   b. Cultural (mechanical) turf management practices
   c. Fertilizer, pesticide applications and efforts to reduce
   d. Habitat and species management
   e. Landscape and cultural heritage
   f. Water usage and efforts to reduce, quality protection
   g. Waste management and recycling efforts
   h. Hazardous materials storage and disposal
   i. Energy efficiency measures
Review and Report

5. Compare and evaluate application report with official club documents, etc.

6. Corroborate golf course consumption data provided.

7. Corroborate all other data provided.

8. Create and submit a written report to GEO Certification Ltd. for publication on GEO’s website consisting of findings and evaluation within a reasonable timeframe (3-4 weeks). The report will contain a recommendation in regards to the awarding of the eco-label by the verifier based on their evaluation.

Knowledge sharing is an important part of the GEO Verifier’s defined role. GEO encourages genuine continual improvement at the golf facility and 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, ensure consistency in information provided across golf facilities and to be then used as a basis for facility recertification.

GEO Certification LTD centralized recording

Central data collection occurs through the web-based OnCourse® programme. All information collected is stored in the website database. All data is secure and treated as confidential until verified.

Reports may be pulled from the website database as required or requested.

Initial certification requires submission of the most recent year’s data to be maintained on the website database.

Re-certification requires submission of the past three years’ worth of data – combined with data from the initial certification.

Trends recording and analysis is built into programme and database allowing for ad-hoc reporting when required as well as regular analysis and review to monitor performance of the standard.

3. Determination Process for Award

After the onsite / remote verification and submission of the verifier’s report, GEO Certification LTD staff follows the below process for determining awarding the eco-label. GEO Certification LTD staff monitor each other to ensure all steps are followed and judgments are made in accordance with GEO procedures and criteria.

1. Qualified GEO Certification LTD member of staff undertakes an initial review of club and GEOSA reports - comparison directly against GEO Certified® Evaluation Criteria.

2. Gaps in information or potential non-conformities with criteria (especially must criteria) are documented and communicated to club and GEOSA for further discussion / evaluation and resolution. This is conducted through Highrise a web-based contact management system and the OnCourse system.

3. The same GEO Certification LTD staff member evaluates feedback from club and GEOSA; again comparison is made with relevant criteria.

4. In cases of continued unresolved issues relating to performance against relevant criteria, especially concerning the ‘must criteria’ or high uncertainty around performance ranking, GEO Certification LTD staff member refers case to GEO Certification LTD. Managing Director (MD) for opinion.

5. Managing Director will: advise on consultation with qualified representatives of the Advisory Council or other members of the Verifier Network to get further information concerning severity of non-compliance, degree of risk,
6. Based on this feedback, a final recommendation (on certification award or certification pending) made by MD to the GEO Certification Ltd. Board of Directors via email; who then have two weeks to query or approve the decision.

7. Club and verifier are notified [potential for Club to initiate complaints and appeals procedure].

8. All club certification highlights and Continual Improvement Points are recorded and stored in the GEO website.

A certificate is issued to the club by GEO Certification LTD, which contains the logo, the signatures of the President of the Advisory Council and the Chief Executive Officer; the date the certificate is awarded and deadline for re-certification to be concluded, the name of the golf club, and the scope of certification (certified or recertified).

4. Oversight of the Verifier Network (GEOSA)

The effectiveness of independent verifiers in assurance and supporting continual improvement;

The monitoring of the GEOSA network is conducted in the following ways and against the following policies and criteria:

- Performance against GEO Verifier Network performance policies and criteria by GEO Certification LTD technical staff.
- On site and remote shadowing of GEOSA - by other GEOSA and/or by a member of the Advisory Council.
- Involvement of Advisory Council member on random certification determinations (to oversee process, consistency and accuracy of decision making and evaluation)
- GEO Certification LTD reserves the right to implement a peer-review process, random on-site oversight inspections by GEO Certification LTD or further oversight by GEO LTD.

GEOSA are only permitted to verify the same club three times running. The fourth on site verification is to be carried out by another GEOSA.

A member of GEO Certification LTD staff that does not have day-to-day involvement with the certification process runs the oversight process provided by the Verifier peer reviews. The evaluation will review the consistency of actions and the effectiveness of the overall oversight process. When necessary, changes to the oversight process will be implemented based on the recommendations resulting from the evaluation. The member of staff responsible for running the oversight process is also responsible for implementing required changes as a result of the oversight process.

GEO Certification LTD states that it has the right to conduct unscheduled reviews in addition to the formal review process.

5. Industry support

Industry support for GEO Certification LTD is monitored through the following activities. These activities are for monitoring GEO Certification LTD’s contact with stakeholders and do not explicitly solicit feedback from stakeholders.

- Regular interface and shared platforms, such as conferences and meetings.
- GEO symposiums to provide stakeholders a way to meet, learn, and talk about sustainable golf.
- Newsletter sent to those who have signed up to receive this communication and provides information on how to get involved.
- Joint communications are undertaken to ensure stakeholders are aware of relevant happenings and how to provide
input.

GEO also tracks the number of organizations that it is involved with and is continuing to expand this list.

6. Conflicts of Interest

Conflicts of Interest within GEO Certification LTD are monitored through the following activities. The following activities are in place to ensure that GEOSA verifiers mitigate potential areas where conflict of interest could arise. However, if a conflict of interest would occur, action would be taken to resolve the conflict of interest and maintain impartiality. This is through escalating the issue to the Boards and Advisory Council, and can lead to dismissal if required.

Verifiers are not permitted to:

- Verify a club that they have advised in the previous 3 years
- Verify a club on more than 3 consecutive occasions
- Verify a club that a direct colleague at the same place of employment has advised in the past 3 years
- Verify a club that they have had ties to in the previous 3 years (membership, employment, board / committee involvement, etc.)
- Suggest that OnCourse® and GEO Certified® require advisory or ongoing professional support services
- Imply any form of exclusivity to their business – advisory or verification
- Associate GEOSA brand with any other products (tools, programmes, award schemes, etc.)
- Associate GEOSA brand with any other 3rd party service provider (technical specialists, educators, etc.)
- Suggest that clubs must choose any particular GEOSA

In addition verifier applicants do not receive eligibility if they are currently employed by certain organisations that might present a conflict of interest in verification.

GEOSA reports and affiliations are checked through peer-reviews, managed by GEO Certification LTD and overseen regularly by GEO LTD. The Advisory Council and Stakeholder Forum are involved in these oversight activities to reduce the possibility of conflicts of interest and ensure a balance of stakeholder input on oversight.

GEO LTD and GEO Certification LTD Policies for Mitigating Conflict of Interest:

- GEO LTD and GEO Certification LTD do not categorically facilitate support relationships, but have extended the option of clubs to have an easily accessible source of support within the context of a highly automated website.
- Decisions regarding whom GEO LTD and GEO Certification LTD invite to serve on boards and committees are influenced by individuals’ present profession, involvement in activities, or associations to avoid conflicts of interest.
- GEO LTD and GEO Certification LTD’s funding model and strategies are carefully considered to mitigate financial incentives to any parties based on certification work.
- Partnerships are carefully considered to ensure proper alignment with commitment to impartiality.
- Advocacy and education activities performed by GEO LTD and GEO Certification LTD are carried out under a mission of driving sustainability performance of the golf industry, and not under a mission of driving certifications by individual facilities. Often these activities are performed through partnership with industry associations to further remove any potential incentives or conflicts of interest.
The CEO GEO LTD. manages GEO LTD. and the Managing Director of GEO Cert Ltd. is the sole senior Manager for GEO Cert. Ltd. The two organisations are managed separately and independently of each other by two separate senior Managers and staff to avoid potential conflicts of interest or risks to impartiality between standard setting and the assurance process. Any issues are resolved through escalation to the respective Boards of GEO LTD. or GEO Cert. LTD. or balanced by input by the semi-external opinion of the Advisory Council or other expert stakeholder groups.

7. Nonconformities and terminations

During verification, public notification or a random surveillance check, if a nonconformity is found at any point throughout the process, the GEOSA will report the nonconformity to GEO Certification LTD’s Project Manager: GEO Certified® and both the GEOSA and Project Manager: GEO Certified will work with the club to resolve the nonconformity. In most cases, the GEOSA will directly inform the club of the nonconformity via email and include the Project Manager: GEO Certified® to ensure the proper processes are followed and completed.

Resolution of the nonconformity must be completed prior to final approval for certification if the nonconformity is found during verification. If the nonconformity is found during surveillance, the GEOSA, GEO Certification LTD’s Project Manager: GEO Certified®, and the club will define an appropriate timeline for resolution and re-evaluation for nonconformities found. The re-evaluation process will follow the same process for verification for each given nonconformity found. If nonconformities are not corrected within the agreed upon timeframe, the club will be suspended and may have its certification removed.

Media claims are reviewed as part of the surveillance practices undertaken by both GEO LTD and GEO Certification LTD between certifications for golf facilities. A communications guidance document is provided to every club on the dos and don’ts as well as provides substantial guidance on what should be provided in a press release including the link to the entire report on GEO’s website upon certification. Within three months of certification, GEO LTD checks media for GEO Certified® clubs to review their website representation of the certification and any other public statements found through Google searches are accurate. Three months is given to clubs due to the average speed it takes a club to make the website updates and issue press releases, etc. Nonconformities found in media claims or public complaints of alleged fraudulent use of GEO’s trademarks and certification properties are handled in the same manner as all other nonconformities and via the Complaints and Appeals processes.

The Project Manager: GEO Certified® is responsible for informing clubs of their suspensions. The Managing Director, GEO Certified Ltd. ensures that the Project Manager: GEO Certified® is properly trained on how to handle an individual suspension and in consultation with CEO GEO Ltd. approves the messaging prior to the clubs being informed of suspensions. Upon delivery of the suspension notice, the MD reviews the process with the Project Manager: GEO Certified® as well.

Renewal of certification is required every three years otherwise the current certification expires. An automated email is sent out to each club 6 months prior to their renewal deadline. If a club does not recertify by the stated deadline, their certification expires. Certification may also be terminated due to nonconformities or other issues as stated in the OnCourse® Programme Terms and Conditions, which clubs must agree to prior to participation in the programme. Upon termination, the club’s directory profile is no longer displayed publicly.

Clubs that have their certification reinstated will have all the appropriate documents updated to reflect the change in certification status. The club’s profile will also be reinstated on the website and displayed to the public once again.

Full details of certification and how non-conformities are handled at each stage of certification, can be found in the OnCourse® Terms and Conditions.
See Also

A4 - Standard Process Flow

OnCourse® Terms & Conditions

A3 – GEO Governance and Oversight